Virginia & Ambinder, LLP

Invoice submitted to:

SEB Services Class Action

40 Broad Street 7th Floor New York, NY 10004

October 13, 2015

Invoice #13188

Professional Services

			Hours	Amount
10/9/2011	IRA	Performed following tasks re: pleadings: drafted pleadings	3.70	
10/18/2011		Attention to drafting summons, complain and civil cover sheet, making copies and scans, asking MT for check office conference with LA	0.70	
	MT	Attn to issue a check made payable to Clerk, EDNY to cover the amount of filing a complaint, updated books and records, etc.	0.20	
10/19/2011	ΥP	Performed following tasks regarding court appearance: filing in EDNY	1.00	
10/20/2011	KMN	File summons	0.60	
10/25/2011	VV	Email correspondence	0.10	
10/28/2011	KMN		0.10	
11/30/2011	LRA	Performed following tasks with respect to settlement: Telephone conversation with CK Lee Esq for D's re possible settlement, file review	0.50	
1/9/2012	SL	Conference with LA re: how to proceed in light of Defendants' failure to respond and the upcoming initial conference.	0.20	
	SL	Preparation of letter motion to the court regarding the upcoming initial conference, in light of defendants' failure to appear.	0.40	
	KMN		0.20	
1/10/2012	KMN		0.30	
1/23/2012		Receipt, review and consideration of invoice received from UPS pertaining to the overnight mail, prepared and submitted payment, updated books and files	0.10	
	MT	Receipt, review and consideration of invoice received from Colby Attorney Services pertaining to the process service, prepared and submitted payment, updated books and files	0.10	
	MT	Receipt, review and consideration of invoice received from PACER pertaining to Public Access to Court Electronic Records fees, prepared and submitted payment, updated books and files	0.10	
1/30/2012	\/\/	Performed following tasks re: pleadings: ran docket report.	0.10	
	VV	Performed following tasks re: pleadings: rain decket report: Performed following tasks re: pleadings: saved affidavit into pleadings.	0.10	
1/31/2012		Attention to email correspondence with LRA re: Notice of Appearance with C.K. Lee	0.10	
	VV	Attention to email correspondence with LRA re: Corporate Disclosure Statement.	0.10	
	VV	Attention to email correspondence with LRA re: Answer to Complaint.	0.10	
	VV	Attention to email correspondence with LRA re: Letter filed by Robert Dinozzi.	0.10	
2/2/2012	VV	Attention to email correspondence with LRA re: settlement to be discussed at initial conference.	0.10	
	KMN	call from D's counsel re rescheduling conference	0.10	

		Hours	Amount
2/3/2012 VV 2/13/2012 VV	Attention to email correspondence with LRA re: Summons returned. Performed following tasks with respect to settlement: Attention to email correspondence with LRA concerning the scheduling of the settlement conference to a later date.	0.10 0.10	
VV	Performed following tasks with respect to settlement: Attention to email correspondence with LRA concerning the scheduling of the initial and settlement conference to a later date.	0.10	
2/21/2012 VV	Attention to email correspondence with LRA concerning initial court conference.	0.10	
2/23/2012 VV	Attention to email correspondence with LRA concerning a notice of appearance.	0.10	
3/13/2012 VV	Attention to email correspondence with LRA concerning the affidavit/declaration filed in support of the motion.	0.10	
VV	Attention to email correspondence with LRA concerning the motion for leave.	0.10	
3/15/2012 LRA	Performed following tasks regarding court appearance: prepared for court appearance, client intake review, call to D's counsel re scheduling order, prepared proposed order, pre-conference meeting with counsel, attend court	3.80	
3/19/2012 VV	Performed following tasks re: pleadings: Attention to email correspondence with LRA concerning scheduling of the status conference.	0.10	
4/2/2012 IAG	Motion Performed the following tasks: office conference with LRA regarding drafting 216(b) motion in this case. E-mail to JP at LMB regarding same	0.10	
IAG	Telephone conference with JP at LMB to go over the case + discuss scheduling meeting with the plaintiffs	0.10	
IAG	Motion Performed the following tasks: e-mail to JP at LMB with samples of affidavits that we've done in the past for 216(b) motions	0.10	
IAG	Motion Performed the following tasks: in preparation for drafting 216(b) motion, reviewed all documents filed in this case up to date, including pleadings, answer, motions to withdraw as attorney, pro hac vice motions, and correspondence between chambers and counsel; organized the file, printing and scanning all documents and uploading onto the WinWord; correspondence with JP at LMB regarding missing information/Consent to Joins in our file; read Judge's rules	3.50	
4/3/2012 IAG	Performed research re: SEB Security (its operations, chain of command, applications, etc.) and Defendant R. Dinozzi. Office conference with LRA regarding same	1.00	
IAG	Performed legal research re: New York Labor Law statutes governing mandatory uniform purchasing. Office conference with LRA regarding same. E-mail to JP at LMB	1.50	
IAG	Motion Performed the following tasks: attention to e-mail from JP at LMB regarding scheduling everyone to come in probably in the evening or on a weekend	0.10	
IAG	Motion Performed the following tasks: drafted certificate of service for 216(b) motion	0.30	
IAG	Motion Performed the following tasks: drafted affirmation of LRA in support of Plaintiffs' motion for conditional class certification pursuant to 29 U.S.C. s. 216(b)	0.40	

		Hours	Amount
4/3/2012 IAG	Motion Performed the following tasks: began drafting memo of law for 216(b) motion	0.50	
4/4/2012 IAG	E-mail to LRA regarding meeting with the plaintiffs in this case next Saturday	0.10	
IAG	Found NYS Department of State info for SEB, printed, and added to the file	0.10	
4/6/2012 VV	Attention to email correspondence with LRA concerning the withdrawal of the pre-motion conference.	0.10	
4/10/2012 IAG	Motion Performed the following tasks: correspondence with JP at LMB regarding finalized meeting date for this Saturday	0.10	
IAG	Motion Performed the following tasks: e-mail to JP at LMB regarding status of contacting Joseph Ozonur	0.10	
IAG	Performed following discovery-related tasks: read Defendant's Initial Disclosures. Scanned document, saved in WinWord, and e-mailed to LRA and JP at LMB	0.20	
4/12/2012 IAG	Motion Performed the following tasks: attention to e-mail from JP at LMB regarding declaration of Joseph Ozonur + response e-mail regarding Saturday's meeting	0.10	
IAG	Motion Performed the following tasks: reviewed declaration of Hamit P drafted by JP and LMB and made changes.	1.00	
4/13/2012 IAG	Motion Performed the following tasks: made changes to declaration of Hamit Phelivan and e-mailed to JP at LMB for review	0.30	
IAG	Motion Performed the following tasks: drafted declaration for Rule 23 of Joseph F. Ozonur	0.50	
IAG	Motion Performed the following tasks: drafted declaration of Ragip Erdem	0.30	
IAG	Motion Performed the following tasks: drafted declaration of Amadou Barry in support of Ps Rule 23 motion	0.30	
IAG	Motion Performed the following tasks: drafted declaration of Amadou Barry in support of Ps Rule 23 motion	0.30	
IAG	Motion Performed the following tasks: drafted declaration of Engin Malcok in support of Ps Rule 23 motion	0.30	
IAG	Motion Performed the following tasks: reviewed declarations of Samuel and Joseph with LRA and made changes	0.40	
4/14/2012 IAG	Motion Performed the following tasks: reviewed case information with JP at LMB in preparation for client meeting	1.00	
IAG	Motion Performed the following tasks: reviewed case information with JP at LMB in preparation for client meeting	1.00	
IAG	Motion Performed the following tasks: met with Amadou and Engin to review client declarations for 216(b) motion with JP at LMB. Scanned and made copies of documents for clients	2.00	
IAG	Motion Performed the following tasks: met with Amadou and Engin to review client declarations for 216(b) motion with JP at LMB. Scanned and made copies of documents for clients	2.00	
IAG	Motion Performed the following tasks: reviewed 216(b) motions drafted in the past with JP at LMB; e-mailed templates to JP; discussed schedule of drafting	0.50	
4/16/2012 IAG	Motion Performed the following tasks: e-mail to JP at LMB regarding scheduling the remaining 4 clients for times this week.	0.10	
IAG	Motion Performed the following tasks: office conference with LRA regarding claims of the clients/updated on Saturday's meeting	0.10	

			Hours	Amount
4/19/2012	SL	Performed following discovery-related tasks: conference with LA regarding the status of the case, and how to proceed with discovery requests.	0.20	
	SL	Performed following discovery-related tasks: conference with IG regarding discovery requests and anticipated motion for an FLSA collective action.	0.10	
	IAG	Motion Performed the following tasks: office conference with SL to update her on the SEB case	0.10	
	IAG	Motion Performed the following tasks: e-mail to JP at LMB with scans of named plaintiffs 216(b) decs	0.10	
	IAG	Motion Performed the following tasks: status update e-mail to JP at LMB and SL; office conference with SL to further discuss the case	0.10	
	IAG	Motion Performed the following tasks: drafted declaration of Shahraaz + office conference with Shahraaz to review declaration; gave status update of the case	1.00	
4/20/2012	IAG	Performed following tasks regarding court appearance: attention to e-mail from LRA regarding motion for court conference; forwarded same to JP at LMB	0.10	
	VV	Attention to email correspondence with LRA concerning motion for pre-motion conference.	0.10	
4/22/2012	LRA	Motion Performed the following tasks: reviewed letter motion to dismiss Dinozzi. Legal research re similar motion in past	1.90	
4/23/2012	SL	Motion Performed the following tasks: review and analysis of correspondence from defense counsel regarding proposed motion to dismiss; assess how to proceed in light of same.	0.40	
	SL	Performed following discovery-related tasks: correspondence with defense counsel regarding the status of discovery and upcoming conference call regarding same.	0.10	
	SL	Motion Performed the following tasks: telephone conference with co-counsel regarding the status of the motion for a collective action, and how to proceed with discovery in light of upcoming telephone conference.	0.20	
	SL	Performed following discovery-related tasks: conference with LA regarding the status of discovery and how to proceed.	0.10	
	IAG	Motion Performed the following tasks: office conference with SL regarding tel conf scheduled for tomorrow; drafting opposition to D's motion	0.10	
	IAG	Motion Performed the following tasks: reviewed Judge Townes' rules regarding whether or not a request must be made for a conference before filing a 216(b) motion; e-mail to SL regarding same	0.10	
4/24/2012	IAG	Performed following tasks: office conference with SL about status of case in preparation for telephone conference at 11:00 a.m. today	0.20	
	SL	Performed following discovery-related tasks: conference with LA regarding the status of discovery, strengths of the case, in preparation for the upcoming conference call with defendants.	0.20	
	SL	Performed following discovery-related tasks: conference with IG regarding the status of the action, discovery steps to be taken, in preparation for upcoming conference call with defendants regarding same.	0.20	
	SL	Performed following discovery-related tasks: review of case file in preparation for upcoming telephone conference with defendants, namely, the complaint, client intakes, correspondence, research	1.00	

				Page 5
			Hours	Amount
4/24/2012	SL	regarding uniform claims, and defendants' letter motion to dismiss. Performed following discovery-related tasks: teleconference with defense counsel regarding the motion to dismiss, how to proceed, plaintiffs' anticipated motion for a collective action, and the status of discovery in light of pending deadlines.	0.20	
	SL	discovery, in light of pending deadlines. Performed following discovery-related tasks: conference with IG regarding issues to be addressed in teleconference, strengths of the case, and pending deadlines.	0.20	
	IAG	Motion Performed the following tasks: pre-telephone call conference with SL and telephone conference with SL and opposing counsel	0.40	
	SL	Performed following discovery-related tasks: review of defendants' discovery requests and Rule 26 disclosures.	0.30	
	SL	Correspondence with co-counsel regarding discovery deadlines, in light of conference call, and how to proceed.	0.20	
	IAG	Performed following discovery-related tasks: attention to e-mails between SL and JP at LMB regarding Ds discovery demands; printed said demands for the file and saved in the WinWord	0.10	
	IAG	Performed following discovery-related tasks: office conference with LRA and SL regarding structuring of depositions & 216(b) motion	0.20	
	SL	Motion Performed the following tasks: conference with LA and IG regarding motion for a collective action, how to proceed, and memorializing issues raised during teleconference with defense	0.20	
	IAG	counsel. Motion Performed the following tasks: discussed damage calculations with Izabela	0.10	
	IG	Performed following discovery-related tasks: performed an audit for Amadou L. Barry and Engin Malcok including OT	0.50	
4/25/2012	SL	Performed legal research re employer status and the 4 relevant factors, in response to defendants' motion to dismiss with respect to the individual defendant.	0.50	
	IAG	Motion Performed the following tasks: office conference with SL regarding deadline for letter in opposition	0.10	
	SL	Performed following discovery-related tasks: review of correspondence from defendants regarding discovery deadlines and proposed dates; assess how to proceed and the likelihood of meeting those deadlines.	0.20	
4/26/2012	IAG	Motion Performed the following tasks: e-mail to SL regarding review of Samuel's declaration	0.10	
	IAG	Performed legal research re: Fed. R. Civ. P. 8, "joint employer" standard under the FLSA; reviewed docket + prior motions drafted by V&A on this topic. Printed and reviewed cases cited by Ds in their two letters to the court.	4.00	
	SL	Performed following discovery-related tasks: review of damage calculations in preparation for discovery responses.	0.20	
4/27/2012	IAG	Motion Performed the following tasks: office conference with SL regarding status of the letter	0.10	
	IAG	Motion Performed the following tasks: e-mail to JP at LMB to check in if she needs help with anything to do with the 216(b) motion	0.10	
	IAG	Motion Performed the following tasks: e-mails with JP at LMB and SL regarding rule 216(b) dec	0.10	

		-	Hours	Amount
4/27/2012	SL	Motion Performed the following tasks: review of declarations in support of motion for conditional certification.	0.80	
	SL	Motion Performed the following tasks: revisions to declaration in support of motion for conditional certification. Correspondence with co-counsel regarding same.	0.50	
	SL	Performed following discovery-related tasks: review of defendants' Rule 26 disclosures.	0.20	
	SL	Performed following discovery-related tasks: preparation of plaintiffs' Rule 26 disclosures with damage calculations.	0.40	
	SL	Performed following discovery-related tasks: preparation of plaintiffs' document requests.	1.50	
	SL	Review of file, client documents and intakes in preparation for discovery requests.	0.50	
	SL	Performed legal research re defendants' cases relied on in support of baseless motion to dismiss.	0.30	
	IAG	Motion Performed the following tasks: drafted letter reply to Ds motion to dismiss letter; office conference with SL regarding same; made changes as per SL's suggestions	4.50	
	VV	Attention to email correspondence with LRA concerning response to opposition.	0.10	
4/30/2012	IAG	Motion Performed the following tasks: office conference with SL regarding points in letter motion	0.10	
	SL	Performed following discovery-related tasks: preparation of and finalize Rule 26 disclosures with damage calculations; correspondence to defense counsel regarding same.	0.40	
	SL	Performed following discovery-related tasks: preparation of plaintiffs' request for interrogatories.	1.50	
	SL	Performed following discovery-related tasks: continued preparation of and finalized plaintiffs' requests for documents.	1.00	
	SL	Performed following discovery-related tasks: preparation of plaintiffs' document responses.	1.50	
5/1/2012	SL	Performed following discovery-related tasks: review of proposed discovery schedule and assess how to proceed in light of heavy litigation schedule.	0.10	
	SL	Preparation of letter motion to Judge Azrack requesting an extension of discovery in light of plaintiffs' heavy litigation schedule. Review of Judge Azrack's rules regarding same.	0.70	
	IAG	Motion Performed the following tasks: attention to e-mails from JP at LMB; sent e-mail reminder regarding redacting Consent to Join forms	0.10	
	IAG	Telephone conference with JP at LMB regarding Plaintiff Engin's bankruptcy proceeding; telephone call with JM regarding same; e-mail to alls counsel on the case with details	0.20	
	IAG	Motion Performed the following tasks: office conference with SL regarding Plaintiff Malcok's bankruptcy	0.10	
	SL	Performed following tasks re: pleadings: analysis and correspondence with co-counsel regarding how to proceed in light of named plaintiffs' potential bankruptcy action.	0.20	
	SL	Motion Performed the following tasks: review and revisions of draft memorandum of law in support of motion for collective action.	1.50	

				Page 7
		-	Hours	Amount
5/1/2012	SL	Motion Performed the following tasks: review and revisions to manager declaration in support of plaintiffs' motion for a collective action.	0.40	
	JM	Discuss consequences of named Plaintiffs' bankruptcy proceedings w/ Suzanne, Jessica	0.20	
5/2/2012	SL	Performed following tasks re: pleadings: conference with IG regarding amending the pleadings due to potential bankruptcy of named plaintiff. Correspondence with co-counsel regarding same.	0.30	
	SL	Performed legal research re review and analysis of Named Plaintiffs' bankruptcy filing; initial research into bankruptcy issues pertaining to Named Plaintiffs, and whether litigation is listed as an asset.	1.50	
	IAG	Motion Performed the following tasks: review of Engin Malcok's bankruptcy filing documents; attention to e-mails from JP at LMB and SL regarding same; preliminary research into bankruptcy filings; office conferences with SL regarding same	1.00	
	IAG	Motion Performed the following tasks: office conference with SL regarding ethical duties of V&A in the bankruptcy matter + steps to take in the future	0.30	
	SL	Performed following tasks re: pleadings: conference with LA regarding potentially amending pleadings in light of client's bankruptcy issues.	0.20	
	KMN		0.30	
	SL	Performed following tasks re: pleadings: telephone conference with co-counsel regarding amending the complaint, and substantive issues addressed in the declaration of Ozonur.	0.20	
	SL	Performed following discovery-related tasks: correspondence to defense counsel regarding the discovery deadline and how to proceed with scheduling.	0.20	
	KMN	· · · · · · · · · · · · · · · · · · ·	0.40	
	IAG	Motion Performed the following tasks: attention and responses to multiple e-mails between SL and JP at LMB regarding client to joins; substitution of Engin Malcok	0.30	
	SL	Motion Performed the following tasks: review and revise memorandum of law in support of motion for conditional certification.	3.00	
	SL	Motion Performed the following tasks: review and analysis of declarations (7 total) in support of motion for conditional certification.	0.50	
5/3/2012	IAG	Performed following discovery-related tasks: office conference regarding status of attempts to get discovery extension approved by Ds	0.10	
	IAG	Motion Performed the following tasks: reviewed and proofread all exhibits, motion papers for 216(b) memo of law; e-mail to SL and JP at LMB with suggestions and changes	1.30	
	SL	Motion Performed the following tasks: continued preparation of memorandum of law in support of motion for a collective action.	3.00	
	SL	Motion Performed the following tasks: preparation of proposed notice in support of plaintiffs' motion for a collective action.	1.00	
	SL	Performed following discovery-related tasks: correspondence with defense counsel regarding the status of discovery.	0.10	
	SL	Motion Performed the following tasks: conference with IG regarding plaintiffs' motion for a collective action and upcoming discovery deadlines.	0.20	

			Hours	Amount
5/3/2012	KMN	Motion Performed the following tasks: e-file four consents (redact,	0.30	
5/4/2012	SL	save) Motion Performed the following tasks: finalize exhibits in support of motion for conditional certification, including proposed publication	0.90	
	SL	Order and Notice. Performed following discovery-related tasks: attention to correspondence with defense counsel regarding the status of discovery; conference with LA regarding same.	0.20	
	IAG	Motion Performed the following tasks: attention to e-mail from SL regarding SEB uniform guards	0.10	
5/7/2012	SL	Correspondence with defense counsel regarding the status of discovery, potential conflicts, and upcoming motion for collective certification. Conference with LA regarding same.	0.30	
	LRA	Performed following discovery-related tasks: file review rediscovery status, office conference with SL, attention to correspondence re same	0.60	
	ΥP	copying and scanning and prepping for Acro	0.30	
	SL	Motion Performed the following tasks: finalize and serve motion with exhibits in support of collective action certification. Correspondence with co-counsel regarding same.	0.50	
5/8/2012	VV	Attention to email correspondence with LRA concerning additional consent to joiner.	0.10	
	VV	Attention to email correspondence with LRA concerning additional consent to joiner.	0.10	
	VV	Attention to email correspondence with LRA concerning additional consent to joiner.	0.10	
5/10/2012	VV	Attention to email correspondence with LRA concerning additional consent to joiner.	0.10	
	VV	Attention to email correspondence with LRA concerning additional consent to joiner.	0.10	
5/15/2012	IAG	Performed following tasks re: pleadings: attention to e-mail question from JP at LMB & e-mail response from SL regarding amending the pleadings	0.10	
	SL	Performed following discovery-related tasks: continued preparation of and finalized plaintiffs' responses to interrogatories and document demands.	2.50	
5/16/2012	SL	Performed following discovery-related tasks: correspondence to co-counsel regarding plaintiffs' discovery responses.	0.10	
	IAG	Performed following discovery-related tasks: reviewed Ps responses to Ds discovery demands	0.30	
	SL	Performed following discovery-related tasks: review and finalize plaintiffs' discovery responses for service.	0.20	
	IAG	Performed following discovery-related tasks: 2 office conferences with SL regarding Ps 216(b) motion and Ds opposition; telephone conference with JP at LMB and defense counsel	0.70	
	SL	Performed following discovery-related tasks: teleconference with defense counsel regarding the status of discovery, and deposition schedules.	0.20	
	SL	Performed following discovery-related tasks: review of file (prior motion papers, discovery requests and responses) in preparation for teleconference with defendants regarding same.	0.70	

			Page	9
		Hours	Am	ount
5/16/2012 SL	Performed following discovery-related tasks: telephone conference with co-counsel and IG regarding conversation had with defense counsel, and how to proceed with discovery deadlines.	0.20		
SL	Performed following discovery-related tasks: conference with IG in preparation for upcoming teleconference with defense counsel regarding discovery deadlines and other issues to be addressed.	0.20		
5/17/2012 IAG	Performed following discovery-related tasks: attention to letter from Ds confirming discovery schedule; e-mail to SL regarding breadth of SEB's service in the US	0.10		
5/21/2012 SL	Performed following discovery-related tasks:	0.20		
5/22/2012 IAG	Performed following discovery-related tasks: attention to e-mail from SL to defendants regarding joint letter to the court	0.10		
5/23/2012 IAG	Performed following tasks with respect to settlement: attention to e-mails with clients' availabilities for depositions	0.10		
SL	Correspondence with co-counsel regarding the upcoming depositions, outstanding discovery, and how to proceed.	0.20		
5/25/2012 IAG	Performed following discovery-related tasks: reviewed letter to the Judge drafted by Ds; office conference with SL regarding same	0.30		
IAG	Performed following discovery-related tasks: attention to Ps response e-mail to Ds letter to the judge; 2nd office conference with SL regarding same	0.10		
IAG	Performed following discovery-related tasks: attention to defense counsel's response e-mail re: discovery schedules & demands; searched through files for Ps responses; office conference with SL regarding same; office conference with KM to retrieve certificate of service; scanned certificate to SL	0.40		
SL	Performed following discovery-related tasks: various lengthy correspondence between counsel regarding the deadline for discovery and several issues to be addressed with the judge.	2.00		
SL	Performed following discovery-related tasks: conference with IG regarding how to proceed with discovery and deadlines, in light of contentious correspondence from defendants.	0.20		
KMN		0.10		
IAG	Performed following discovery-related tasks: attention to another e-mail from defense counsel; telephone conference regarding same with SL	0.10		
5/29/2012 IAG	Motion Performed the following tasks: coordinate new telephone conference time with SL/LRA; attention to e-mails from all counsel regarding same	0.10		
LRA		0.80		
LRA	·	0.70		
5/30/2012 SL	Performed following discovery-related tasks: preparation for upcoming telephone conference regarding discovery dispute, e.g. review of prior correspondence, and assess how to proceed	0.30		
SL	Performed following discovery-related tasks: telephone conference with defense counsel regarding the discovery deadlines; pre-conference with LA and IG regarding how to proceed.	0.20		

			Hours	Amount
5/30/2012	IAG	Motion Performed the following tasks: attention to letter from Ds counsel and office conference with SL regarding same	0.10	
	SL	Performed following discovery-related tasks: review and analysis of defendants' motion for discovery extension to prepare arguments in response.	0.40	
	SL	Motion Performed the following tasks: letter motion in opposition to Defendants' motion for an extension of time to take depositions before submitted opposition papers to Plaintiffs' motion for an FLSA collective action.	0.80	
5/31/2012	SL	Motion Performed the following tasks: review of Judge Azrack's recent Order regarding Defendants' application, and preparation of letter in response to same, and in partial opposition to Defendants' request. Inclusive of conference with LA regarding same.	1.50	
	VV	Motion Performed the following tasks: Attention to email correspondence with LRA concerning motion to extend discovery.	0.10	
	LC	Performed following tasks regarding court appearance: discussed with SL Judge's decision to grant defendants' request for extension for opposition papers	0.20	
	SL	Performed following discovery-related tasks:review and analysis of Judge Azrack's Orders regarding the discovery deadlines, and assess how to proceed.	0.20	
6/1/2012	VV	Attention to email correspondence with LRA concerning Ps letter to judge about FLSA statute of limitations.	0.10	
	VV	Motion Performed the following tasks: Attention to email correspondence with LRA concerning response to motion for an extension for discovery.	0.10	
6/4/2012	SL	Motion Performed the following tasks: telephone conference with co-counsel, regarding Judge Azrack's recent decision on defendants' application for an extension, and how to proceed in light of the upcoming teleconference with the court.	0.10	
	IAG	Performed following discovery-related tasks: attention to correspondence between counsel regarding Ds' delay in providing discovery responses	0.10	
6/5/2012	IAG	Performed following discovery-related tasks: attention to e-mails regarding deposition dates for named Ps and telephone conference with Judge today. E-mail to SL regarding same	0.10	
	IAG	Telephone conference with SL and JP at LMB, defense counsel, and the Judge re: dates of depositions. Pre- and post telephone conference with SL regarding producing R. DiNozzi	0.50	
	SL	Performed following tasks regarding court appearance: preparation for telephone conference with Judge Azrack, to wit, review of prior submissions to the court regarding discovery issues, docket and the complaint. Conference with IG regarding same.	0.40	
	SL	Telephone conference with Judge Azrack regarding the proposed discovery and briefing schedule.	0.10	
6/7/2012	IAG	Performed following discovery-related tasks: attention to e-mails between counsel regarding attached discovery responses for both parties; quickly reviewed all attache documents	0.30	
	SL	Performed following discovery-related tasks: initial review and analysis of defendants' discovery responses with documents (approximately 450 pages).	1.50	

		Hours	Amount
6/11/2012 SL	Preparation of 30(b)(6) deposition notice, and correspondence to	0.30	
6/12/2012 IAG	counsel regarding same. Attended office conference with SL regarding EBT notice sent to Ds	0.10	
6/13/2012 IAG	(Robert Dinozzi) Performed following discovery-related tasks: office conference with SL	0.10	
6/14/2012 IAG	regarding strategy to depose DiNozzi; upcoming deposition schedule Telephone conference with JP and SL regarding deposition	0.20	
IAG	preparation today; office conference with SL regarding same Performed following discovery-related tasks: reviewed documents for	1.50	
IAG	deposition preparation of Amadou Barry Performed following discovery-related tasks: deposition preparation of Amadou Barry with SL	1.50	
SL	Performed the following tasks with respect to the deposition of Amadou Barry: Met with client to prepare for upcoming depositions and review the claims in the action.	2.00	
SL	Performed the following tasks with respect to the deposition of plaintiffs: several conferences with IG and JP regarding the upcoming depositions and strategy decisions; conference with IG regarding outline in preparation for upcoming depositions.	0.50	
SL	Performed the following tasks with respect to the deposition of Amadou Barry: Thorough review of defendants' documents pertaining to plaintiff Barry, in preparation for upcoming deposition and meeting with client regarding same.	1.50	
6/15/2012 LC	Performed the following tasks with respect to the deposition of plaintiffs - discussed with SL the deposition preparation of plaintiffs and strengths of the case that were revealed during such	0.20	
SL	Performed the following tasks with respect to the deposition of plaintiffs: correspondence with co-counsel regarding strategy decisions in case; apprise of yesterday's preparation session in light of upcoming deposition, and facts uncovered through initial review of documents.	0.20	
SL	Performed the following tasks with respect to the deposition of Engin Malcok: Meeting with client in preparation for upcoming deposition.	1.50	
IAG	Performed following discovery-related tasks: reviewed documents for Engin Malcok deposition preparation; office conferences with SL regarding discovery materials that Ds just produced	1.50	
IAG	Performed following discovery-related tasks: deposition preparation of Engin Malcok with SL	1.30	
SL	Performed the following tasks with respect to the deposition of Malcok: Review of defendants' records, in preparation for client meeting regarding upcoming deposition.	1.50	
6/18/2012 SL	Performed the following tasks with respect to the deposition of plaintiffs: review of witness statements and relevant documents; meet with clients Engin Malcok and Amadou Barry regarding their upcoming depositions.	1.50	
SL	Performed the following tasks with respect to the deposition of Amadou Barry: defend deposition.	6.00	
SL	Performed following discovery-related tasks: initial review of defendants' voluminous production, in light of tomorrow's deposition.	1.00	
6/19/2012 IAG	Attended office conference with SEB regarding deposition of Amadou Barry yesterday	0.10	

		Hours	Amount
6/19/2012 IAG SL	Performed legal research re: portal to portal act Performed the following tasks with respect to the deposition of Engin Malcok: defend deposition.	2.00 6.00	
6/20/2012 IAG		0.10	
SL	Performed following discovery-related tasks: conference with co-counsel, JP, regarding strategy for reviewing defendants' voluminous document production, in light of upcoming deposition of defendants.	0.20	
IAG		2.00	
SL	Performed following discovery-related tasks: review and analysis of defendants' voluminous production of documents (over 1,000 pages), in preparation for upcoming deposition of defendant; correspondence with co-counsel regarding same.	4.50	
IAG		0.20	
IAG		0.10	
SL	Performed following discovery-related tasks: conference with IG, and various correspondence with co-counsel and defense counsel regarding various discovery issues e.g. defendants' baseless objections, additional production, and how to proceed.	0.50	
6/22/2012 SL	Performed the following tasks with respect to the deposition of defendant: continued thorough review of documents, preparation of outline and case summary, in preparation for upcoming deposition.	3.83	
SL	Performed the following tasks with respect to the deposition of defendant: conference with IG regarding how to proceed and preparation for upcoming deposition.	0.20	
JM	Review case file to prepare for deposition Tuesday	3.60	
IAG		0.10	
6/25/2012 IAG		0.10	
SL	Performed following discovery-related tasks: correspondence with defendants regarding the status of defendants' deposition, plaintiffs' opposition to an adjournment of same, in light of repeated requests for scheduling.	0.20	
IAG		1.00	
SL	Performed following discovery-related tasks: conference with IG regarding outstanding discovery issues to be addressed, in light of defendants' baseless objections.	0.20	
IAG		0.20	

			Hours	Amount
6/25/2012	SL	Performed following discovery-related tasks: follow up correspondence with defense counsel regarding the status of discovery and depositions, in light of defendants' failure to appear on noticed date.	0.10	
	IAG	Performed legal research re: "high executive officer" standard for depositions	2.00	
	JM	Preparing for dep tomorrow	6.80	
6/26/2012		Performed legal research re: whether or not a motion to dismiss stays discovery; office conference with SL regarding the same	2.00	
	IAG	Performed following discovery-related tasks: drafted letter regarding Fed. R. Civ P. 26(b) & (c) to defense counsel (for deposition of Robert DiNozzi); office conference with SL regarding the same	1.50	
	YΡ	coping paystubs for SL	1.00	
	SL	Performed following discovery-related tasks: review of additional documents produced by Plaintiff Malcok (paystubs from 2004-2008), to be submitted to defendants.	1.00	
	SL	Performed following discovery-related tasks: preparation of letter motion requesting an extension of the discovery deadline. Correspondence to defense counsel regarding same.	0.50	
	SL	Performed following discovery-related tasks: conference with IG regarding how to proceed in light of defendants' refusal to produce the named defendant; review of correspondence to defense counsel regarding same.	0.50	
	VV	Mailed out paystubs to Engin Malock.	0.20	
	SL	Performed following discovery-related tasks: correspondence to defense counsel regarding additional discovery produced by Plaintiff Malcok.	0.10	
6/27/2012	SL	Performed following discovery-related tasks: review of Judge Azrack's Order regarding the extension of discovery.	0.10	
6/28/2012	VV	Motion Performed the following tasks: Attention to email correspondence with LRA concerning motion for an extension of time to complete discovery.	0.10	
6/29/2012	VV	Telephone conference with Jessica; transferred to Suzanne Leeds.	0.10	
	SL	Performed following tasks re: pleadings: conference with co-counsel (JP) regarding an amended complaint, substituting Plaintiff Malcok for a uniformed guard.	0.20	
7/2/2012	IAG	Motion Performed the following tasks: reviewed D's memo of law in opposition to P's 216(b) + attached exhibits; e-mail to SL regarding drafting a reply	0.50	
	IAG	Motion Performed the following tasks: office conference with SL regarding drafting of reply to Ds 216(b) opp & the research that will be needed	0.10	
	SL	Motion Performed the following tasks: thorough review and analysis of defendants' MOL and exhibits in opposition to plaintiffs' motion for conditional certification, formulating arguments in response. Conference and correspondence with IG and co-counsel (JP) regarding strategy for same.	2.50	
	IAG	Motion Performed the following tasks: office conference with SL regarding strength of Ds opp motion to our 216(b) and main arguments to focus on	0.10	

			Hours	Amount
7/2/2012	IAG	Motion Performed the following tasks: office conference with SL	0.10	
	SL	regarding travel time over 1 hour & CT summary judgment case Performed thorough research and analysis regarding defendants' cited authority, shepardizing same, particularly cases pertaining to travel and off the clock time, in furtherance of plaintiffs' motion for conditional certification.	4.00	
7/3/2012	IAG	Performed legal research re: pulling, reviewing, and tabbing cases cited by the Defendants in their 216(b) opposition	3.00	
	SL	Motion Performed the following tasks: continued research and analysis regarding failure to pay for travel time to and from work, vs. travel time between jobs; further shepardize defendants' cited authority, in support of plaintiffs' motion for collective action certification.	1.50	
7/9/2012	SL	Motion Performed the following tasks: review and analysis of client intake and declaration pertaining to new opt in plaintiff, (George Akcelik), and claims of the uniformed guards.	0.30	
	VV	Attention to email correspondence with LRA re additional consent to join.	0.10	
	SL	Motion Performed the following tasks: Begin preparation of reply memorandum of law in further support of motion for collective certification, focusing on plaintiffs' overtime claims.	4.00	
7/10/2012	SL	Performed following tasks re: pleadings: correspondence with co-counsel (JP) regarding potential new named plaintiff, a former uniformed guard, and how to proceed with same.	0.20	
	SL	Motion Performed the following tasks: research and analysis regarding how to proceed with motion to amend pleadings to substitute plaintiff; review of judge's rules and case law on same.	1.00	
	IAG	Attended office conference with SL regarding cases where Ds have alleged individualized claims as a defense	0.10	
	SL	Motion Performed the following tasks: conference with IG regarding arguments in reply to 216(b) motion.	0.20	
	VV	ECF consent to join of Murphy Moise.	0.20	
	SL	Motion Performed the following tasks: continued preparation of plaintiffs' reply memorandum in further support of collective certification, focusing on distinguishing defendants' cited authority, and highlighting defendants' policy of failing to pay for travel time.	6.00	
7/11/2012	IAG	Motion Performed the following tasks: office conference with SL regarding whether or not we should move for a nationwide class action based on current evidentiary information available	0.10	
	SL	Motion Performed the following tasks: correspondence with defense counsel regarding extension to file motion for collective action certification; correspondence to the court requesting same.	0.30	
	SL	Performed following discovery-related tasks: conference with GO regarding defendants' responses, and how to proceed with organizing and analyzing same.	0.20	
	SL	Motion Performed the following tasks: conference with IG regarding strategy decisions on conditional certification motion, evidentiary support for same, and how to proceed.	0.20	
	SL	Motion Performed the following tasks: continued preparation of memorandum of law, further distinguishing defendants' cited authority, and expanding upon travel time analysis, refuting defendants'	5.50	

Dage	4.5
Page	15

		Hours	Amount
	arguments regarding defenses.		
7/12/2012 SL	Motion Performed the following tasks: continued preparation of plaintiffs' reply memorandum of law, further arguing that plaintiffs' travel time is compensable, distinguishing defendants' cited authority.	2.00	
7/13/2012 SL	Motion Performed the following tasks: continued preparation of memorandum of law in reply to plaintiffs' motion for collective action status, highlighting case law regarding inapprorpriate merit-based	2.50	
SL	inquiries on a 216(b) motion, distinguishing defendants' cited authoirty. Motion Performed the following tasks: continued preparation of memorandum of law in reply to plaintiffs' motion for collective action status, substantiating that there are similarly situated individuals deprived of overtime, undermining defendants' arguments regarding same.	3.00	
7/16/2012 SL	Performed following discovery-related tasks: conference with RM regarding SEB document review, key issues in the case, and what to investigate while reviewing.	0.20	
RM	Performed following discovery-related tasks: Entered relevant information from time sheets and pay stubs into an excel sheet from January 2008 to December 2008.	7.20	
SL	Motion Performed the following tasks: continued preparation of reply memorandum of law, focusing on employer knowledge, and irrelevant to a motion for collective action status, highlighting the inaccuracies in defendants' cited authority.	2.00	
7/17/2012 RM	Performed following discovery-related tasks: Entered relevant information from time sheets and pay stubs into an excel sheet from January 2006 to December 2007.	8.00	
7/18/2012 IAG	Motion Performed the following tasks: office conference with SL regarding extension of 5 pages for reply; attention to e-mails between counsel regarding the same	0.10	
SL	Motion Performed the following tasks: preparation of correspondence to the court regarding page extension request; correspondence with defendants' counsel regarding same.	0.20	
RM	Performed following discovery-related tasks:	7.20	
SL	Motion Performed the following tasks: Continued preparation of Plaintiffs' reply memorandum of law in further support of conditional certification, further highlighting defendants' misapplied case law, further substantiating that plaintiffs have shown similarly situated exist with respect to claims.	5.50	
7/19/2012 LRA		4.60	
SL	Performed following discovery-related tasks: correspondence to the court regarding parties' request for discovery extension; correspondence with defense counsel regarding same.	0.40	
SL	Performed legal research re basis for nationwide collective action certification, and analogous cases and evidentiary support where such request was granted.	1.50	
SL	Motion Performed the following tasks: Continued preparation of reply MOL, specifically arguing that plaintiffs' claims should be certified nationwide, highlighting case law and evidence submitting supporting same.	4.83	

			Hours	Amount
7/19/2012	SL	Motion Performed the following tasks: conference with LA regarding revisions to reply MOL and substantive issues addressed.	0.20	
7/20/2012	SL	Motion Performed the following tasks: continued preparation of and finalize plaintiffs' reply MOL in further support of conditional certification; preparation of table of authorities. E-file fully briefed	6.00	
		motion.		
	SL	Motion Performed the following tasks: research and analysis into motion to amend complaint; preparation of application regarding same.	1.50	
7/23/2012	SL	Motion Performed the following tasks: preparation of correspondence to Judge Azrack regarding the parties' motion papers and submission of courtesy copies.	0.20	
	SL	Motion Performed the following tasks: finalize courtesy copy of motion papers to be submitted to Judge Azrack.	0.50	
	IAG	Motion Performed the following tasks: reviewed Ps reply to Ds 216(b) opposition and office conference with SL regarding same	0.30	
	YP	Assembling multiple motions, sending to acro, reviewing and upsing	1.50	
7/25/2012	IAG	Performed following tasks re: pleadings: office conference with SL regarding amending the complaint	0.10	
	SL	Performed following discovery-related tasks: review and revise lengthy correspondence to defense counsel regarding plaintiffs' anticipated motion to compel DiNozzi's deposition, should defendants continue to	0.70	
	SL	refuse to produce. Motion Performed the following tasks: preparation of letter	1.50	
	OL	application to file motion to amend the complaint.	1.50	
7/26/2012	SL	Motion Performed the following tasks: finalize plaintiffs' application	0.70	
	SL	for leave to file an amended complaint. Motion Performed the following tasks: finalize plaintiffs' application for leave to file an amended complaint.	0.50	
	SL	Correspondence to defense counsel regarding plaintiffs' anticipated motion to amend the complaint, an whether they consent to same, in accordance with Rule 14(a)(2).	0.10	
7/27/2012	SL	Review of defendants' proposed motion to dismiss the action against Engin Malcok, in light of discharged bankruptcy. Research and analysis regarding same; assess how to proceed.	1.50	
	SL	Performed following discovery-related tasks: correspondence with defense counsel regarding the status of discovery, outstanding matters, and defendants' purported objection to the deposition of	0.20	
	IAG	defendant DiNozzi. Motion Performed the following tasks: office conference with SL	0.10	
	IAG	regarding D's summary judgment motion against Engin Malcok Motion Performed the following tasks: reviewed deposition	1.30	
7/30/2012	IAG	transcripts for Engin and Amadou for SL for Reply Motion Performed the following tasks: reviewed bankruptcy law article e-mailed by SL	0.20	
	SL	Motion Performed the following tasks: telephone conference with co-counsel (JP) and IG regarding Plaintiff Malcok's bankruptcy case, how to proceed; conference with client regarding same, Defendants'	0.50	
	IAG	motion for summary judgment, and how to proceed in light of same. Motion Performed the following tasks: office conference with SL before telephone conference to discuss main points of Ds motion for summary judgment; telephone conference with JP, SL, and Engin	0.30	

Page	17	7
raue	- 17	1

			Hours	Amount
7/30/2012	SL	Malcok; 2nd telephone conference with JP and SL afterwards Motion Performed the following tasks: correspondence to defense counsel regarding proposed motion to dismiss Mr. Malcok's claims,	0.10	
8/2/2012	SL	and how to proceed. Performed the following tasks with respect to the deposition of defendant: correspondence with defense counsel regarding their repeated failure to provide a date, and plaintiffs' intent to seek judicial intervention.	0.10	
	IAG	Attended office conference with SL regarding Ds upcoming EBT + taking Robert DiNozzi's deposition by the end of this month; attention to e-mail from defense counsel regarding same	0.10	
	SL	Motion Performed the following tasks: review and analysis of defendants' opposition to plaintiffs' motion to amend; assess how to	0.40	
	SL	proceed. Performed following discovery-related tasks: conference with IG regarding how to proceed with discovery, in light of deficiencies and	0.20	
	SL	outstanding depositions. Motion Performed the following tasks: research and analysis regarding plaintiffs' anticipated motion to compel; correspondence to defense counsel regarding same.	0.50	
8/3/2012	IAG	Motion Performed the following tasks: attention to e-mail from SL regarding today's appointment with Engin Malcok; drafted notice of discontinuance; office conference with KBM to review	0.20	
	IAG	Performed following tasks with respect to settlement: reivewed Ds August 2, 2012 letter to Judge Townes re opposition to amending the complaint; office conference with SL regarding same	0.20	
	IAG	E-mail to SL and JP regarding Engin Malcok not coming into the office yet to sign his discontinuance papers	0.10	
	IAG	Motion Performed the following tasks: 2nd e-mail to SL and JP regarding Engin	0.10	
8/6/2012	IAG	Attended office conference with SL regarding Engin Malcok missing his appointment on Friday	0.10	
	IAG	Attended office conference with SL regarding Defendants' request for a settlement conference	0.10	
	SL	Performed following tasks with respect to settlement: review of defendants' letter request for settlement; preparation of letter to the court in opposition to defendants' disingenuous request for settlement, in light of failure to make any settlement demand, and their statement regarding the purportedly low value of plaintiffs' strong wage and hour claims.	0.50	
8/15/2012	IAG	Attended office conference with SL regarding Engin Malcok appointment; correspondence with JP to coordinate scheduling appointment	0.10	
	IAG	Motion Performed the following tasks: attention to correspondence between counsel regarding scheduling telephone conference with Judge Azrack	0.10	
	SL	Performed following discovery-related tasks: correspondence with defense counsel regarding depositions, and potential discontinuance of Plaintiff Malcok's claims. Preparation of stipulation regarding same.	0.40	

		Hours	Amount
8/16/2012 SL	Motion Performed the following tasks: preparation for upcoming teleconference with defendants regarding anticipated motion to	0.50	
SL	compel, and potential request to Judge Azrack. Motion Performed the following tasks: teleconference with defendants regarding plaintiffs' anticipated motion to compel.	0.20	
IAG	Telephone conference with SL and defense counsel re: deposing Robert DiNozzi; e-mail to JP at LMB regarding Engin Malcok and dismissal of claims with prejudice	0.20	
8/17/2012 VV 8/21/2012 SL	Attention to email correspondence with LRA re conference scheduling. Correspondence with defense counsel regarding their baseless objection to defendant DiNozzi's deposition, and how to proceed with	0.10 0.30	
SL	discovery and the upcoming settlement conference. Performed following tasks with respect to settlement: conference with LA regarding upcoming settlement conference before Judge Azrack, and strategy for same.	0.10	
8/22/2012 SL	Performed the following tasks with respect to the deposition of defendants: lengthy teleconference with defense counsel, IG and LA regarding defendants' baseless objection to plaintiffs' depositions; post conference with LA and IG.	0.70	
IAG	Telephone conference with SL, LRA, and defense counsel re: producing 30(b)(6) witness and/or Robert DiNozzi, upcoming deposition on the 29th of August	0.60	
LRA		0.70	
8/23/2012 IAG	Attended office conference with LRA and SL regarding upcoming conference with Judge Azrack; discussed Apex depositions & Ds arguments	0.40	
IAG	Performed legal research re: Apex depositions for today's telephone conference with Judge Azrack	0.50	
IAG	Attended office conference with SL regarding Judge Azrack being away on vacation; what to do on Tuesday's telephone conference	0.10	
SL	Performed legal research re apex deposition, exceptions to	0.50	
IAG	depositions, in light of defendants' repeatedly baseless objections. Attended office conference with SL and later SL and LRA regarding documents to be used during the 30(b)(6) deposition	0.20	
SL	Performed the following tasks with respect to the deposition of defendant: preparation of outline and review of documents regarding upcoming deposition.	1.50	
LRA		0.90	
SL	Performed following tasks regarding court appearance: preparation of memorandum regarding discovery issues this far, relevant case law on deposition of high level executive v. employer under FLSA, in light of upcoming teleconference.	0.40	
8/24/2012 IAG	Performed following discovery-related tasks: reviewed documents for 30(b)(6) dep, which were set aside by SL	4.00	
8/27/2012 IAG	Performed following discovery-related tasks: reviewed, tabbed documents provided by SEB in preparation for 30(b)(6) witness deposition	5.50	

			Hours	Amount
8/28/2012	IAG	Performed following discovery-related tasks: office conference with LRA regarding 30(b)(6) and assisted LRA with conference call with Judge Azrack	0.80	
	IAG	Performed following discovery-related tasks: reviewed and tabbed documents produced by SEB for 30(b)(6) deposition tomorrow	2.40	
	VV	Attention to email correspondence with LRA re judge's order.	0.10	
	IN	Reviewed and tabbed documents previously produced by Defendants in preparation for Ps 30(b)(6) deposition on August 29, 2012	4.20	
	IAG	Motion Performed the following tasks: attention to voicemail from Engin Malcok and e-mail from JP at LMB regarding stip of dismissal	0.10	
	IAG	Motion Performed the following tasks: reviewed documents produced by Ds and office conference with LL in preparation for tomorrow's 30(b)(6)	1.00	
	KMN	review order, enter dates into calendar.	0.20	
	KMN	Performed the following tasks with respect to the deposition of Frank Newton: conf w IG, emails w LA, IG re scheduling, call LHR to book reporter.	0.30	
	LRA	Performed the following tasks with respect to the deposition of D's 30b6: meeting with Isabel G. re doc for depo. Reviewed and culled documents. Telephone conference with Ladonna re line of questions	2.50	
	JM	Assist LA, IG, LL with preparation for tomorrow's deposition of 30-b-6 witness	1.10	
	LML	Performed the following tasks with respect to the deposition of Frank Newton: reviewed d's docs and file; office conf w/ IG re same and exhibits	5.00	
8/29/2012	IAG	Performed following discovery-related tasks: office conference with LRA regarding 30(b)(6) dep and type of documents to be pulled and copied; began pulling and copying documents	1.00	
	VV	Performed the following tasks with respect to dep: Made copies of deposition material for IG.	1.20	
	IAG	Performed following discovery-related tasks: copied and staples documents with V.V. for today's deposition of Frank Newtown; assisted LL at deposition of Frank Newton	10.00	
	LML	Performed the following tasks with respect to the deposition of Frank Newton: reviewed d's docs and file; office conf w/ IG re same and exhibits; took deposition; debriefing with LA	9.00	
8/30/2012	IAG	Performed following discovery-related tasks: drafted summary of depositions and documents demanded on the record during deposition of Frank Newton; e-mailed to SL	0.20	
	KMN		0.30	
9/4/2012	SL	Motion Performed the following tasks: review of Judge Townes' Order regarding defendants' motion to dismiss and plaintiffs' motion to amend the complaint. Assess how to proceed.	0.30	
	SL	Performed following discovery-related tasks: review of Judge Azrack's decision regarding discovery and deposition dispute. Assess how to proceed.	0.10	
	SL	Performed the following tasks with respect to the deposition of defendant: review of exhibits shown and summary of deposition to assess strengths and how to proceed in light of same.	0.40	

			Hours	Amount
9/6/2012	SL	Conference with IG regarding the recent deposition of defendants, facts learned, outstanding discovery, and how to proceed in light of	0.50	
	IAG	same. Attended office conference with SL regarding review of Frank Newtown's deposition testimony & documents that need to be requested	0.30	
9/9/2012 9/12/2012		Performed following tasks: prepared for Wednesday mediation Performed following tasks regarding court appearance: assisted SL and LRA at mediation	2.00 3.00	
	SL	Performed following tasks with respect to settlement: attend settlement conference before Judge Azrack, with IG and LA.	3.00	
	SL	Performed following tasks with respect to settlement: preparation for today's settlement conference, e.g. review of prior motions, deposition transcript, client file, and other court submissions.	1.00	
	LRA	Performed following tasks: prepared for and attend mediation before Azrack	4.00	
9/13/2012	IAG	Performed following discovery-related tasks: e-mail to JP at LMB re: update on court mediation yesterday and status question re: Engin	0.10	
	IAG	Telephone conference with Enging re: stip of dismissal; sent fax to Engin with stip; e-mail to SL and JP at LMB with update	0.20	
	IAG	Telephone conference with Engin re: receipt of fax	0.10	
	IAG	Performed legal research re: whether or not employers can have employees working at two different wage rates based on the client that they service and how OT would be calculated; office conference with SL regarding same	2.50	
	SL	Performed legal research re conference with IG regarding research on the legality of charging different rates, and thus having different rates of pay throughout employment.	0.20	
9/14/2012	VV	Attention to email correspondence with LRA re telephone conference.	0.10	
	IAG	Performed following discovery-related tasks: e-mail to KM to check on status of transcript request	0.10	
	KMN	· ·	0.20	
9/19/2012	IAG	Performed the following tasks with respect to the deposition of Frank Newtown: e-mail request to KM to check with LH Reporting re: deposition transcripts of Frank Newton	0.10	
	IAG	Telephone conference with Judge, defense counsel, co-counsel, LRA, and SL re: number of undercover employees at SEB; office conference with LRA afterwards	0.50	
	KMN	Performed the following tasks with respect to the deposition of F Newton : email w IG, SL re hard copy	0.20	
9/20/2012	IAG	Attended office conference with SL re: certification of nationwide and drafting formal request letter to Ds for the production of documents	0.20	
9/22/2012	IAG	Performed following discovery-related tasks: work on deposition transcript digest of Frank Newton	3.50	
9/24/2012	IAG	Performed following discovery-related tasks: finished drafting digest of Frank Newton deposition transcript	8.00	
9/25/2012	IAG	Performed the following tasks with respect to the deposition of Frank Newtown: reviewed deposition digest and organized quotes into categories; e-mail to JP and SL regarding same; office conference with SL regarding same	3.20	

		Hours	Amount
9/25/2012 IAG	Performed legal research re: FLSA and NYLL record keeping	1.00	
IAG	requirements Performed following discovery-related tasks: drafted letter to Ds re: deficient production of documents; e-mailed to SL for review; office conference with SL regarding same	0.70	
SL	Performed the following tasks with respect to the deposition of defendant: review of Frank Newton deposition digest, to assess weaknesses in Defendants' case, and whether to proceed with anticipated motion for summary judgment.	0.70	
SL	Performed following discovery-related tasks: review and revise letter regarding deficient discovery to defendants.	0.30	
SL	Motion Performed the following tasks: review and revise stipulation re: Malcok's claims.	0.20	
VV	Attention to email correspondence with LRA re minute entry proceedings.	0.10	
SL	Performed following discovery-related tasks: correspondence to defendants regarding deficient discovery, and stipulation pertaining to Mr. Malcok.	0.10	
9/28/2012 IAG	Motion Performed the following tasks: reviewed Judge Townes' Order re: motion to dismiss, amending the complaint & office conference with SL regarding same	0.30	
SL	Motion Performed the following tasks: telephone conference with chambers regarding stayed briefing schedule on motion to amend; correspondence with defendants regarding same.	0.20	
SL	Motion Performed the following tasks: conference with IG regarding how to proceed with motion to amend, in light of Judge Townes' Order.	0.20	
10/1/2012 IAG	Telephone conference with SL, defense counsel, JP at LMB, and judge's clerk re: motion to dismiss & motion to amend; telephone conference with SL and LRA afterwards	0.60	
SL	Performed following tasks regarding court appearance: telephone conference with Judge Azrack's chambers regarding defendants' request to submit a sur-reply; post conference with LA, IG and JP regarding how to proceed in light of same.	0.50	
10/2/2012 SL	Performed following tasks regarding court appearance: review of court scheduling order regarding pending motion requests; assess how to proceed.	0.10	
10/5/2012 LRA	Motion Performed the following tasks: office conference with SL re sur-reply. Reviewed witness intake, affidavits. Discussed motion with SL	0.50	
10/8/2012 SL	Performed following tasks re: pleadings: review of plaintiffs' deposition transcript, to amend complaint with further allegations pertaining to Defendant Robert DiNozzi. Amend complaint in accordance with same.	2.50	
SL	Performed the following tasks with respect to the deposition of plaintiff Akcelik: correspondence with defense counsel regarding the additional deposition of new named plaintiff.	0.10	
10/9/2012 SL	Motion Performed the following tasks: review of new plaintiff Akcelik's payroll records and client file to assess new claims in complaint, and in preparation for upcoming deposition.	0.70	
SL	Performed following tasks re: pleadings: revise and finalize amended complaint; correspondence with defense counsel regarding same.	0.50	

			Hours	Amount
10/9/2012	LRA	Motion Performed the following tasks: compared depo transcripts to new claims for uniformed sec'y guards. Office conference with SL re same	0.70	
10/10/2012	IAG	Performed following discovery-related tasks: attention to scheduling e-mails for new client between counsel; office conference with SL regarding same	0.10	
	IAG	Performed following tasks re: pleadings: reviewed P's amended complaint; e-mail to SL with comments	0.30	
10/15/2012	IAG	Performed the following tasks with respect to the deposition of Gungor: office conference with SL to review logistics	0.10	
	SL	Motion Performed the following tasks: review of defendants' request for extension of time.	0.10	
10/16/2012	IAG	Motion Performed the following tasks: attention to e-mail from Defense counsel re: death in Robert DiNozzi's family; attention to e-mail response from SL	0.10	
	VV	Motion Performed the following tasks: Attention to email correspondence with LRA re motion for an extension to file.	0.10	
10/22/2012	IAG	Performed the following tasks with respect to the deposition of Gungar: attention to e-mails to schedule Turkish interpretor	0.10	
10/23/2012	IAG	Performed the following tasks with respect to the deposition of reviewed and printed documents for tomorrow's deposition prep of new Named Plaintiff	1.50	
10/24/2012	IAG	Attended office conference with SL re: documents forwarded by Defendants last night, possibly canceling the deposition of Gungar in order to have more time to prepare	0.10	
	IAG	Performed following discovery-related tasks: attention to additional documents provided by Ds for Gungor	0.40	
	IAG	Performed the following tasks with respect to the deposition of Gungor: preparation of Gungor with JP and SL at LMB	6.00	
	SL	Performed the following tasks with respect to the deposition of Plaintiff Gungor Ackelik: meet with plaintiff to prepare for deposition, at office of L&B with JP and IG.	6.50	
	SL	Performed the following tasks with respect to the deposition of Plaintiff Akcelik: review and analysis of 100+ documents recently produced by defendants, pertaining to the plaintiff, in preparation for deposition.	1.50	
10/25/2012	IAG	Performed the following tasks with respect to the deposition of Gungor: reviewed main points & claims with Gungor, JP, and SL in preparation for today's deposition	0.80	
	IAG	Performed the following tasks with respect to the deposition of Gungor: typed up deposition notes and saved them in the Client Info file in the Winword	0.50	
	SL	Performed the following tasks with respect to the deposition of Akcelik: meeting with LA, IG and JP in preparation for today's deposition.	1.50	
	SL	Defend deposition of Plaintiff Akcelik.	8.00	
10/26/2012	SL	Performed the following tasks with respect to the deposition of plaintiff Akcelik: conference with IG and LA, apprising of yesterday's deposition, developing strategy, and assessing how to proceed in light of same.	0.40	
	LC	Performed the following tasks with respect to the deposition of plaintiff - security guard - conferenced with LA, IG, and SL re yesterday's deposition and plaintiff's testimony and impact of such on case	0.70	

			Hours	Amount
10/26/2012	IAG	Performed the following tasks with respect to the deposition of	1.50	
	SL	Gungor: reviewed deposition transcript Performed the following tasks with respect to the deposition of Akcelik: conference with IG regarding deposition digest, and how to proceed with motion in light of same.	0.50	
	IAG	Performed the following tasks with respect to the deposition of plaintiff - security guard - conferenced with LA, LC, and SL re deposition and plaintiff's testimony and impact of such on case	0.70	
11/5/2012	SL	Motion Performed the following tasks: telephone conference with client (Gungor) and IG regarding status of the action and last week's deposition; post-conference with IG regarding how to proceed in light of same.	0.30	
	IAG	Telephone conference with Gungor re: e-mail; office conference with SL re: status of the case	0.30	
	IAG	Motion Performed the following tasks: e-mail to JP at LMB to set up telephone conference + update re: telephone conference with Gungor	0.10	
	IAG	Performed following discovery-related tasks: began deposition digest of Gungor	1.00	
11/6/2012	IAG	Attended office conference with SL; second e-mail request to JP at LMB to schedule telephone conference	0.10	
	VV	Attention to email correspondence with LRA re IG notice of appearance.	0.10	
	KMN	Performed following tasks re: pleadings: NOA for IAG	0.10	
11/8/2012		Performed following discovery-related tasks: third e-mail to SL and JP at LMB to schedule telephone conference	0.10	
11/9/2012	IAG	Performed following discovery-related tasks: attention to e-mails from SL and JP at LMB to schedule Monday telephone conference	0.10	
11/12/2012	IAG	Attended office conference with SL re: uniformed guards, upcoming paperwork to be filed by Ds; telephone conference with JP at LMB and SL regarding same	0.50	
	SL	Motion Performed the following tasks: conference with IG and JP (co-counsel) regarding defendants' sur-reply on the 216(b) motion, how to proceed in light of same, developing strategy.	0.50	
	IAG	Performed the following tasks with respect to the deposition of Gungor: request to KM to check with reporting service for hardcopy of the deposition transcript	0.10	
11/13/2012	KMN	file transcript of D's dep	0.10	
11/14/2012	SL	Motion Performed the following tasks: conference with IG regarding deposition digest of Akcelik deposition, and how to proceed with pending motion for conditional certification.	0.20	
	IAG	Attended three office conferences with SL re: deposition of Gungor and status of the digest	0.20	
	IAG	Performed following discovery-related tasks: finished digest of Gungor & e-mailed to JP at LMB and SL	5.00	
	IAG	Performed following discovery-related tasks: attention to e-mail form MT at LMB re: JP at LMB; e-mails with SL regarding same	0.10	
11/15/2012	IAG	Attended office conference with SL re: JP leaving LMB; reviewing files, setting up client meetings for next week; reviewing claims and intakes compiled by LMB	0.50	
	SL	Attended office conference with IG regarding plaintiffs' and defendants' depositions, potential opt-ins, and developed strategy in the case, particularly in light of defendants' pending sur-reply in	0.50	

		-	Hours	Amount
11/15/2012	SL	opposition to 216(b) motion. Motion Performed the following tasks: preparation of letter in opposition to defendants' sur-reply, highlighting key testimony of defendants' witness, and requesting the opportunity to submit a	1.00	
	SL	response to the sur-reply. Motion Performed the following tasks: thorough review and analysis of defendants' testimony, in anticipation of defendants' sur-reply, and	2.50	
	IAG	plaintiffs' request to respond with damaging testimony. Telephone conference with Fathi re: JP at LMB leaving and V&A working on the case	0.10	
	IAG	Telephone conference with Amadou re: status of the case & JP at LMB leaving the LMB	0.10	
	IAG	Telephone conference with Hamit re: claims (voicemail asking for call back)	0.10	
	IAG SL	Attended office conference with SL re: filing Fathi's consent to join form Motion Performed the following tasks: receipt, review and analysis of defendants' supplemental reply in opposition to 216(b); formulate arguments in response and assess how to proceed.	0.10 0.80	
11/16/2012	SL	Conference with LA regarding defendants' supplemental response, arguments in response, and strategy decisions in light of same.	0.20	
	SL	Motion Performed the following tasks: finalize and ECF letter motion for request to submit sur-reply, highlighting defendants' damaging testimony and the need for further clarification.	0.70	
	SL	Performed legal research re shepardize defendants' cited authority in supplemental response; formulate arguments in response for anticipated reply.	2.00	
11/19/2012	IAG	Motion Performed the following tasks: receipt, review and analysis of defendants' supplemental reply in opposition to 216(b); review plaintiffs' letter request for a sur-reply; office conference with SL resame	0.80	
	SL	Motion Performed the following tasks: conference with IG regarding defendants' supplemental reply, arguments to be made in response, and how to proceed.	0.20	
12/4/2012	IAG	Motion Performed the following tasks: attention to e-mail from MT at LMB re: 2 new opt-ins; office conference with SL re: same	0.10	
12/10/2012	IAG	Attended office conference with SL re: status of the case; e-mail to MT at LMB re: contact with two potential plaintiffs	0.10	
12/11/2012	IAG	Motion Performed the following tasks: attention to e-mail from Gungor; forwarded to SL; sent response e-mail to Gungor re:	0.10	
	IAG	scheduling a telephone conference for today Telephone conference with Gungor re: status of the case with SL; office conference with SL afterwards regarding 2 potential new clients; e-mail to MT at LMB with status update	0.20	
	SL	Conference with client re: telephone conference with IG and Plaintiff Akcelik to provide status update of case.	0.20	
	SL	Attended office conference with IG re: status of action, pending 216(b) motion, and how to proceed.	0.10	
12/13/2012	IAG	Attention to package from Gungor; office conference with SL & LRA; sent thank you e-mail to Gungor	0.10	
12/19/2012	IAG	Motion Performed the following tasks: e-mail to SL and MT at LMB re: two potential new clients who were supposed to call V&A	0.10	

			Hours	Amount
1/14/2013	IAG	Attended office conference with SL re: status of the case & e-mail to 2 named plaintiffs with case update	0.20	
2/6/2013	IAG	Attended office conference with SL re: sur-reply and schedule to complete in the next few weeks	0.10	
3/4/2013	SL	Telephone conference with potential claimant/uniform guard re: claims against SEB.	0.40	
3/7/2013		Teleconference with potential client, uniformed SEB guard Akgun about claims.	0.20	
3/12/2013	SL	Attended office conference with LA re: potential claimant formerly employed as a uniformed guard at SEB, and pending motion for a collective action.	0.20	
	SL	Motion Performed the following tasks: correspondence with co-counsel (MT) re potential opt-in plaintiff who worked as a uniform guard, and claims supporting same.	0.10	
	SL	Telephone conference with potential client (uniformed guard Akgun) re: claims alleged.	0.20	
3/14/2013	KMN	Client matter re: call from NP re contacting SL, case update	0.20	
4/8/2013	SL	Performed following tasks regarding class action notice: review of Judge Azrack's Order re: 216(b) notice and potential for sur-reply. Assess how to proceed.	0.10	
4/10/2013	SL	Motion Performed the following tasks: preparation of letter motion to court re extension for 216(b) supplemental reply. Correspondence with defense counsel re same.	0.20	
4/11/2013	VV	Attention to email correspondence with LRA re MOTION for Extension of Time to File Supplemental Response to Motion for Conditional Certification	0.10	
4/12/2013	VV	Motion Performed the following tasks: Attention to email correspondence with motion granting extension to file.	0.10	
4/22/2013	SL	Motion Performed the following tasks: review of defendants' deposition transcript in preparation for supplemental reply papers in further support of 216(b) motion.	2.50	
	SL	Performed legal research re shepardize defendants' cases in preparation for supplemental sur-reply in further support of motion for collective action.	2.50	
	SL	Motion Performed the following tasks: preparation of supplemental surreply in further support of 216(b) motion, highlighting the strength of nation-wide overtime claims.	2.00	
4/23/2013		scanning transcripts for SL	0.20	
	SL	Motion Performed the following tasks: continued preparation of supplemental reply in further support of conditional certification, highlighting plaintiffs' overtime and travel time claims for both undercover and uniform guards.	4.00	
	SL	Motion Performed the following tasks: review of plaintiff Akcelik's deposition transcript to incorporate excerpts from same into supplemental brief in further support of conditional certification.	1.50	
4/24/2013	LRA	Motion Performed the following tasks: reviewed sur-reply and transcripts	1.80	
	SL	Performed legal research re nationwide collective actions with analogous facts to this action to warrant certification.	2.00	

			Hours	Amount
4/24/2013	SL	Motion Performed the following tasks: continued preparation of supplemental reply, highlighting excerpts from defendants' deposition transcript, supporting a nationwide collective.	3.50	
	SL	Motion Performed the following tasks: review of defendants' deposition transcript to find evidence justifying a nationwide collective.	1.50	
	SL	Motion Performed the following tasks: continued preparation of and finalize supplemental reply memorandum, further arguing for certification of plaintiffs' nationwide overtime and travel time claims.	3.00	
4/25/2013	VV	Attention to email correspondence with LRA re REPLY in Support re Notice of MOTION to Certify Class Conditionally	0.10	
	SL	Motion Performed the following tasks: correspondence to Judge re courtesy copy.	0.20	
	SL	Review and organize case files in light of recent activity in case and to assess the status.	0.80	
	ΥP	copies for SL	0.50	
4/30/2013		Attended office conference with LB Law re: status of case.	0.10	
5/6/2013	_	Teleconference with client (Gungor Ackelik) re: the status of the action.	0.30	
3/0/2013	SL	Telephone conference with client's personal lawyer (Gungor Ackelik) re the status of the action and assessment of damages.	0.20	
6/4/2013	SL	Client matter re: teleconference with client (Akcelik) re status of the action.	0.20	
9/18/2013	SL	Client matter re: teleconference with client (Gungor) re status of action.	0.40	
11/22/2013	SL	Motion Performed the following tasks: review of Judge Azrack's thorough decision granting conditional certification nationwide to uniform and undercover guards. Assess how to proceed in light of same.	0.70	
	SL	Litigation strategy meeting with: LA re: correspondence re Judge Azrack's recent decision and how to proceed.	0.10	
11/23/2013	LRA	Motion Performed the following tasks: reviewed decision. Reviewed docket and winword file -remote- re status of case and memo to file re going forward	1.10	
11/25/2013	SL	Litigation strategy meeting with: LA re: decision granting conditional certification, and how to proceed in light of same.	0.20	
12/4/2013	LRA	Motion Performed the following tasks: reviewed decision in NYLJ	0.20	
12/5/2013	SL	Client matter re: teleconference with client apprising of Judge Azrack's recent decision granting conditional certification, discussing next steps and strategy.	0.40	
	SL	Performed following tasks regarding class action notice: review of Judge Azrack's 216(b) decision and revise Notice in accordance with same. Correspondence to defense counsel re same.	1.00	
12/11/2013	SL	Performed following tasks regarding class action notice: review defendants' revisions to notice; revise publication order; correspondence to defense counsel re same.	0.70	
	SL	Performed following tasks regarding class action notice: follow up correspondence with defense counsel re proposed notice and publication order.	0.20	
	SL	Performed following tasks re: pleadings: revise amended complaint and e-file same in accordance with Judge's Order.	0.70	
12/18/2013	KBM		0.50	

				3-
			Hours	Amount
12/19/2013	LRA	Performed following tasks regarding court appearance: prepared for and appear on Telephone conference with Court. Post call with SL and JB/MT re litigation strat. Post call with SL doing document research	0.80	
	SL	Performed following tasks regarding court appearance: review of Judge Azrack's recent Decision, the proposed notice, in preparation for upcoming teleconference.	0.40	
	SL	Attended office conference with LA re preparation for upcoming teleconference with the court.	0.20	
	SL	Performed following tasks regarding court appearance: teleconference with court re 216(b) notice and potential for settlement.	0.20	
	SL	Litigation strategy meeting with: LA, MT and JB re: teleconference with court, when/whether to consider settlement discussions, whether notice should go out before.	0.30	
12/20/2013	SL	Performed following tasks with respect to settlement: teleconference with defense counsel re whether to proceed with settlement conference and deadline to inform court.	0.10	
	SL	Attended office conference with LA re potential for settlement, whether to request settlement conference with court, strategy for same.	0.20	
12/23/2013	SL	Performed following tasks regarding class action notice: attention to correspondence from court re final notice and order.	0.10	
12/24/2013	SL	Performed following tasks with respect to settlement: attention to correspondence from defense counsel re position on settlement conference. Review of letter to court re same.	0.20	
	LRA	Reviewed file and intakes, deposition transcript. Reviewed approved letter to court. Memo to file re post class certification issues	0.90	
1/16/2014	SL	Client matter re: teleconference with client (Gungor) re status of action, the notice of lawsuit, and further steps to be taken.	0.30	
	SL	Teleconference with Court re status of notice.	0.10	
2/3/2014	SL	Performed following tasks regarding class action notice: review of publication order and revised notice, approved by Judge Azrack. Assess how to proceed.	0.20	
2/14/2014	SL	Client matter re: communication with client re status of notice.	0.20	
3/3/2014		Performed following tasks regarding class action notice: review of employee list from D.	0.10	
	SL	Performed following tasks regarding class action notice: finalize notice for publication; review of Judge's final order re notice for same.	0.70	
	IC	Attended office conference with SL about some translations and emails in the same regard	0.20	
3/4/2014	IC	Drafted translations of the documents consent to join and notice of lawsuit, includes conference with LC, SL, JM, also email to SL.	6.08	
	SL	Performed following tasks regarding class action notice: conference with IC re translation of 216(b) notice.	0.20	
3/10/2014	SL	Performed following tasks regarding class action notice: conference with LA re publication of notice.	0.20	
	SL	Performed following tasks regarding class action notice: review of publication order and communications with notice administrator re same.	0.30	
	KMN	Review notice, email GES re translation request. Conf w SL, FRG re mailing.	0.40	
3/11/2014	KMN	Email w SL, FRG re translation	0.20	

			Hours	Amount
3/12/2014	KMN	Check on status of notice, forward translated notice to FRG, pay GES,	1.00	
3/13/2014	SL	ocnf w SL re contacting FRG for updates Performed following tasks regarding class action notice: review of judge's publication order to ensure compliance; follow up with KM re Spanish certification.	0.20	
	KMN	request translator's certificate from GES, email w SL re same	0.20	
3/17/2014	SL	Performed following tasks regarding class action notice: correspondence with administrator re status of notices.	0.10	
0/40/0044		Save, ecf translator's certificate	0.20	
		Performed following tasks regarding class action notice: email FRG re consents received, email SL re same. Scan, save received consent.	0.20	
3/19/2014		Client matter re: claims: conference with Toy Worble (Telephone conference with)	0.20	
	SL	Performed following tasks regarding class action notice: teleconference with potential opt-in plaintiff about notice.	0.20	
	KMN	Scan, save consent rec'd; correpsondence w FRG re updates on consents on rolling basis. Conf w SL re same.	0.40	
3/20/2014	SL	Performed following tasks regarding class action notice: teleconference with opt-in plaintiff (Michael B) re lawsuit and plaintiffs' allegations.	0.30	
	LRA	Client matter re: Telephone conferences returned calls to 5 class members	1.30	
3/21/2014	SL	Litigation strategy meeting with: MT re: information gathered from opt-in plaintiffs; how to proceed with gathering information and potential for settlement.	0.30	
	SL	Performed following tasks with respect to settlement: teleconference with LLeeds and JB re settlement discussions had with defense counsel and how to proceed with settlement formula.	0.20	
	SL	Performed following tasks with respect to settlement: conference with MT re mechanism for settlement, establishing a settlement formula and potential amount owed to undercover and uniform guards.	0.50	
	SL	Performed following tasks regarding class action notice: teleconference with member of collective (Dana B) with questions re notice and to gather information re claims in lawsuit. Follow up correspondence re same.	0.80	
	SL	Revise questionnaire to be used to compile data re collective of workers, to aid in settlement discussions.	0.80	
3/24/2014	SL	Performed following tasks regarding class action notice: memo to colleagues re client intakes and gathering data.	0.20	
	SL	Performed following tasks regarding class action notice: teleconference with former SEB worker (M. Foanna) interested in learning about the case. Investigate claims and fact-gathering interview. Follow up correspondence re same.	0.50	
	SL	Performed following tasks with respect to settlement: conference with LA re assess damage formula for settlement purposes.	0.20	
	SL	Performed following tasks regarding class action notice: telephone interview with collective member (Bobby P) re questions re notice and to gather facts re employment. Follow up correspondence re same.	0.70	
	KMN	Email w FRG re consents, save, scan, redact. Conf w SL re filing, organizing.	1.00	
	KMN	Email w MT, SL re adobe intake; intake w client.	0.30	

			Hours	Amount
3/25/2014	VV	Client matter re: Telephone conference with client re the status of the case.	0.10	
	SL	Performed following tasks with respect to settlement: review of questionnaire responses and assess value of potential settlement; preparation of damage calculation spreadsheet.	0.80	
	SL	Litigation strategy meeting with: MT re: potential amount of settlement based on communications with workers.	0.20	
3/26/2014	SL	Performed following tasks with respect to settlement: revise damage calculations; preparation of settlement proposal in light of promising settlement discussions had.	1.50	
	SL	Performed following tasks with respect to settlement: conference with JB re potential for settlement, basis for calculations, and key facts supporting plaintiffs' case.	0.30	
	SL	Performed following tasks regarding class action notice: teleconference with collective member (Farid D) re notice, intake of potential claims in action, and how to proceed.	0.50	
	SL	Performed following tasks with respect to settlement: conference with JB and MT re revisions to settlement proposal.	0.20	
3/27/2014	SL	Performed following tasks with respect to settlement: attention to communications with defense counsel re potential for settlement.	0.10	
	SL	Litigation strategy meeting with: AG re: information learned from interviews with opt-in plaintiffs, potential for settlement, how to proceed.	0.20	
3/31/2014	KMN	·	1.30	
4/1/2014		used Consents to Join for spreadsheet/ client information	1.20	
	KMN	Request consents from FRG	0.10	
4/2/2014	IN	used Consents to Join for spreadsheet/ client information	1.80	
	KMN		1.50	
4/3/2014	KMN	Prepare filing of consents - list, NOF, efile. Update totals.	2.00	
4/7/2014	SL	Performed following tasks re: pleadings: teleconference with defense counsel re response to amended complaint.	0.10	
	SL	Performed following tasks re: pleadings: review of defendant's answer to amended complaint.	0.20	
	VV	Telephone conference with client re the status of the case; performed intake, submitted questionnaire.	0.40	
	VV	Telephone conference with client re the status of the case; performed intake, submitted questionnaire.	0.40	
	KMN	Extract, save individual consents in file	2.20	
4/8/2014	IN	Performed following discovery-related tasks: entered data using Consent to Join forms sent by clients to FRG	2.60	
	KMN	Cross check lists of optins with one from FRG, update spreadsheet	0.70	
4/9/2014	IN	Performed following discovery-related tasks: entered data using Consent to Join forms sent by clients to FRG	4.60	
		Call from client - intake	0.30	
		Email FRG re new consents, save, print, add to tally	1.20	
4/10/2014	SL	Performed following tasks with respect to settlement: attention to correspondence with defense counsel re upcoming settlement meeting.	0.10	
	IN	Performed following discovery-related tasks: entered data using Consent to Join forms sent by clients to FRG	2.60	

			Hours	Amount
4/10/2014 F 4/16/2014 F		Redact, draft NOF, file new consents, conf w SL, LA re same. Performed following discovery-related tasks: update totals of Consent to Join forms sent by clients to FRG	1.50 0.60	
L	LRA	Client matter re: client intake MsCoy	0.40	
L	LRA	Client matter re: Telephone conference with with opt-in re claim	0.40	
4/17/2014 I	IN	Performed following discovery-related tasks: updated total of Consent forms received from FRG	1.10	
4/30/2014 I	IN	Performed following discovery-related tasks: updated totals of Consent to Join forms sent by clients to FRG, entered client data	1.60	
5/1/2014 I	IN	Performed following discovery-related tasks: updated the spreadsheet totals per date	0.30	
I	IN	Performed following discovery-related tasks: downloaded intakes from adobe and saved them into the system.	0.40	
5/7/2014 I	IN	Performed following discovery-related tasks: updated a spreadsheet with total Consent to Join responses	0.50	
5/14/2014 I	IN	Performed following discovery-related tasks: updating file in regards to Consent to Join responses.	0.80	
L	LRA	Performed following tasks regarding class action notice: reviewed intakes, filings and status	0.50	
5/15/2014 I	IN	Performed following discovery-related tasks: redacted/saved documents in the system	0.30	
5/19/2014		Litigation strategy meeting with: MT re: how to proceed with potential settlement discussions in light of close of notice period.	0.20	
5/21/2014 I I	IN IN	Performed following discovery-related tasks: Performed following discovery-related tasks: updated response tally	1.10	
5/22/2014 I	IN	re. Consents to Join Performed following discovery-related tasks: updated mail responses	1.40	
5/23/2014 I	IN	of Consent to Join. Performed following discovery-related tasks:updated total tally, reacted consents to Join /e-mailed to Konstancja.	0.20	
5/27/2014	SL	Litigation strategy meeting with: JB re: strategy for teleconference with defense counsel- claims alleged, makeup of opt-in plaintiffs, and potential for settlement.	0.20	
5	SL	Performed following tasks with respect to settlement: revise damage calculations and preparation of memo for upcoming conference with JB and defense counsel.	1.30	
S	SL	Litigation strategy meeting with: MT re: teleconference with defense counsel and how to proceed with potential mediation.	0.20	
ŀ	KMN	Review consents, redact, alphabetize, draft NOF, efile, update tally.	0.80	
5/28/2014		Litigation strategy meeting with: MT and JB in preparation for	0.30	
		teleconference with defendants re discovery issues and potential for mediation.		
\$	SL	Performed following discovery-related tasks: teleconference with defense counsel and JB and MT re scope and timing of discovery, mediation scheduling, in preparation for tomorrow's court conference.	0.20	
I	IN	Performed following discovery-related tasks: updated total tally of responses	0.40	
5	SL	Performed following tasks: attention to correspondence from defense counsel re mediator's availability.	0.10	
5/29/2014	SL	Performed following tasks regarding court appearance: teleconference with court re status of case after bar date.	0.20	

			Hours	Amount
5/29/2014	SL	Performed following tasks regarding court appearance: preparation for upcoming conference to provide status update to court- review of opt-in total and discovery plan.	0.20	
6/2/2014	SL	Litigation strategy meeting with: MT re: documents and information to request in advance of mediation, and damage calculations for same.	0.30	
6/4/2014	SL	Litigation strategy meeting with: AG re: background of case and strategy for upcoming mediation, documents to be requested and reviewed in preparation for same.	0.40	
6/5/2014	SL	Performed following tasks: teleconference with mediator in preparation for upcoming mediation. Review of correspondence from mediator regarding procedures and rules.	0.40	
	SL	Litigation strategy meeting with: JB and MT re: strategy for upcoming mediation and pre-mediation documents to be requested.	0.20	
	SL	Performed following tasks: correspondence to defense counsel providing overview of pre-mediation discovery requests.	0.20	
	IN	Performed following discovery-related tasks:updated total tally, reacted consents to Join /e-mailed to Konstancja.	0.30	
6/6/2014	ALG	Litigation strategy meeting with: SL re: mediation negotiation coming up	0.50	
6/11/2014	IRA	Performed following tasks: email request for information	0.20	
0/11/2011	SL	Performed following tasks: review of defendants' pre-mediation discovery requests; conference with LA re same.	0.20	
	IC	Telephone conference with 12 with mom of one of the clients, and 3 vm.	0.50	
	IC	Drafted email to clients who did not picked up phone.	0.50	
6/12/2014		Performed following tasks: review of defendants' pre-mediation requests; assess how to proceed.	0.20	
6/16/2014	SL	Litigation strategy meeting with: MT re: logistics of upcoming mediation, defendants' discovery requests in preparation for same, and potential compromise in light of deadlines.	0.20	
	SL	Performed following tasks: teleconference with defense counsel re limitations to pre-mediation discovery requests and how to proceed.	0.20	
	SL	Litigation strategy meeting with: IG re: information to be gathered in preparation for upcoming mediation, review of chart and questionnaire for same.	0.40	
	SL	Performed following tasks: review of questionnaire responses and preparation of instructions to intern staff to help obtain further responses for upcoming mediation.	0.70	
	SL	Performed following tasks: meeting with staff interns regarding telephone interviews to conduct and questionnaires to complete in preparation for upcoming mediation.	0.60	
	IC	Client matter re: SL	0.40	
	EC	Performed following tasks: Had an office conference in which we	0.50	
	EC	discussed the details of the questionnaire and how to go about calling people to ask them questions. Then we divided up the list of contacts among each of us.	0.50	
	SL	Performed following tasks: communications with client (Barry) re upcoming mediation and conditions for settlement.	0.30	
	AS	Performed following tasks: Participated in a conference with SL, IG, EJ, EC, Ines, Christina, MN to be briefed on the SEB case. Made calls (down the list from: Samake, Lahaou to Brown, Marvin) to gather information for mediation. Was able to fill out questionnaires for Laird	4.80	

			Hours	Amount
		Bowers, Philip Billik, Sheila M. Alexander, and Uriah T. Barry Sr. Incomplete questionnaires for Timothy Jr. Alston, Stacey Angansani, and Josuah Paul Anderson.		
6/16/2014	IG	Also left voicemails for clients that were unable to come to the phone. Performed following tasks: Office conference with SLK, AS, EC, EJ, CI, IC, and MN re questionnaire	0.60	
	IG	Performed following tasks: Office conference with SLK re questionnaire; made questionnaire hardcopy template; reviewed	1.30	
	EJ	clients list that should be called; reviewed file Performed following tasks: conference w/ SL, IG, and others re questionnaires and phonecalls to clients.	0.20	
	IG	Performed following tasks: Office conference with AS and helped with questions	0.20	
6/17/2014	MN	Performed following tasks: Calling and sending emails regarding the SEB questionnaires	1.50	
	IG	Performed following tasks: Office conference with IN re questionnaire and helped with questions	0.20	
	IG	Performed following tasks: Created a work schedule spreadsheet re questionnaire; correspondence with SLK	0.60	
	EJ	Performed following tasks: sending emails to 5 clients re questions and contact; attempting phone calls to clients.	0.50	
	IN	Telephone conference re. client intake with Mr.Boyd	0.10	
	CI	Client matter re: intake on employment experience at SEB	0.20	
6/18/2014	IG	Performed following tasks: Office conference with EJ, CI, and NM re questionnaire and status	0.20	
	IN	Telephone conference/ intake for Robert Barbagallo	0.20	
	SL	Performed following tasks: follow up conferences with interns re questionnaires and data collection in preparation for mediation.	0.30	
	IG	Performed following tasks: Office conference with SLK re handwritten questionnaires; scanned drafts of questionnaires into the system	0.30	
	IG	Performed following tasks: Office conference with SLK and Christina I. re transferring information from handwritten forms into pdf file	0.20	
	IG	Performed following tasks: Office conference with IC re questionnaire and helped with questions	0.10	
	IG	Performed following tasks: Office conference with SLK re finalizing questionnaires	0.10	
	IG	Performed following tasks: Scanned handwritten questionnaires prepared by IC and scanned into system	0.10	
	IG	Performed following tasks: Scanned handwritten questionnaires prepared by IN and scanned into system	0.10	
	IG	Performed following tasks: Scanned handwritten questionnaires prepared by MN and scanned into system	0.10	
	IG	Performed following tasks: Follow up with IC, EC, CI, and MN in calling clients re questionnaire	0.20	
	MN	Performed following tasks: Calling and sending emails regarding the SEB questionnaires.	1.50	
	EJ	Performed following mediation related tasks: Phone conversations two clients regarding employment information in order to complete questionnaires.	0.40	

			Hours	Amount
6/18/2014	SL	Performed following tasks: review of questionnaires obtained in furtherance of settlement discussions; compile same into chart for mediation.	0.70	
	SL	Performed following tasks: correspondence with defense counsel re pre-mediation discovery.	0.20	
6/19/2014	IN	Performed following discovery-related tasks:updated total tally, reacted consents to Join /e-mailed to Konstancja.	0.20	
	CI	Performed following tasks: spoke with SEB security guards for intakes, typed written questionnaires into pdf files	3.00	
	IN	Telephone conference/ intakes with clients	0.80	
	EC	Performed following tasks: Called multiple clients in attempts to fill out the SEB questionnaire. I managed to get in contact with and filled out the questionnaire for Wayne C. Fox, Daniel Francois, Gregoria Frias, Frisley Fuentes, and Joshua R. Fullbeck. Then I scanned the questionnaires into the system.	2.90	
	IC	Attended office conference with IG in regard SEB, this task includes scan 5 documents and save one	0.40	
	SL	Performed following tasks: conference with LA re upcoming mediation session and preparation for same.	0.20	
	SL	Performed following tasks: review of defendants' documents, produced in furtherance of mediation session.	2.20	
	EJ	Performed following tasks: phonecall and filling in questionnaire for Lavon Little	0.40	
6/20/2014	CI	Performed following tasks: typed questionnaires into pdf files	0.50	
0/20/2014	IC	Drafted to Sussan since email of client was received.	0.10	
	SL	Performed following tasks: conference with IC re questionnaire responses from opt-in plaintiff.	0.20	
	IC	Drafted email to client, who request the questions send by email. This task includes brief conference with SL who check it before it was send.	0.60	
	CI	Performed following tasks: created pdf versions of questionnaires	0.40	
	IC	Performed following tasks: save document on filed	0.10	
	IG	Performed following tasks: Office conference with IC re questionnaires and helped with questions	0.20	
	IG	Performed following discovery-related tasks: Scanned ready handwritten questionnaires into the system	0.20	
	IG	Performed following tasks: Office conference with SKL re status of calling people and taking intakes/preparing questionnaires	0.20	
6/22/2014	SL	Performed following tasks: review and analysis of questionnaire results and generate charts re same.	0.90	
	SL	Preparation of mediation statement in preparation for upcoming mediation.	2.70	
6/23/2014	SL	Performed following tasks: partial review of defendants' voluminous pre-mediation production and client documents to gather evidence in support of mediation statement.	2.40	
	SL	Performed following tasks: continued preparation of mediation statement. Correspondence to co-counsel re same.	4.20	
	KMN	Performed following tasks regarding class action notice: review docket, winword, emails w FRG re consents to file. Conf w SLK re same. Draft NOA, efile consents.	1.50	

			Hours	Amount
6/24/2014	SL	Performed following tasks: review of MT revisions to mediation statement; incorporate and revise same; finalize. Correspondence to	2.40	
	SL	mediator re same. Performed following tasks: teleconference with client (Barry) re upcoming mediation.	0.30	
	SL	Performed following tasks: teleconference with client (Gungor) re upcoming mediation.	0.30	
	SL	Litigation strategy meeting with: MT re: preparation for upcoming mediation.	0.20	
	SL	Litigation strategy meeting with: JB and MT re: key facts to be investigated for upcoming mediation, and strategy for same.	0.20	
	SL	Performed following tasks: telephone conferences with various opt-in plaintiffs to verify key facts in preparation for upcoming mediation.	1.60	
6/25/2014		Performed following tasks: teleconferences with opt-in plaintiffs to gather further facts in preparation for mediation.	1.30	
6/26/2014	SL	Performed following tasks: attend mediation session. Litigation strategy meeting with: LA and MT re: outcome of today's mediation and how to proceed.	7.50 0.30	
6/30/2014	IC	Performed following tasks: draft email to SL in regard the answer via emial from one of the clients.	0.20	
	SL	Prepare case memo re status of action in light of upcoming maternity leave.	0.10	
7/9/2014	IN ALG	filed NOF and Consent to Join for Baldwin, Corey Telephone conference with defense counsel and leeds brown re settlement	0.30 0.70	
7/10/2014	SL	Litigation strategy meeting with/re: teleconference with MT re upcoming status conference with court, discovery to be obtained in furtherance of settlement discussions and how to proceed.	0.20	
7/11/2014	ALG	filed notice of appearance and reviewed SL mediation statement for background	1.50	
	ALG	Telephone conference with defense counsel and Leeds Brown regarding settlement status and upcoming call with court	0.60	
8/13/2014		Call form client re update on case, new address.	0.20	
8/15/2014		Performed following tasks with respect to settlement: reviewing and analyzing settlement files in preparation for settlement calculations	0.20	
8/18/2014		Reviewed defendants letter breaking down their damage assessment for settlement purposes	1.50 0.20	
		Performed following tasks regarding class action notice: email SK re late claim forms, save forms from FRG.	0.50	
		Performed following tasks regarding class action notice: conf w LA re late consents, file consents.		
		Call from client - verify contact info, receipt of consent	0.20	
		Call from client re case update; verify contact info	0.10 0.10	
		Client call re case update Client matter re: call from D Switzer re updated contact info, email w Anusheh re same, conf w IN re same.	0.10	
	IN	Telephone conference with Donnie Sweitzer regarding address update.	0.10	
10/8/2014		Received phone call with an updated address for client. Sent a message to appropriate attorney.	0.10	
10/9/2014	LRA	File review and Telephone conference with D's counsel re settlement and discovery	1.00	

			Hours	Amount
10/9/2014	IRΔ	Telephone conference with court. Post conf with MT	0.50	
10/3/2014		Attention to Rule 68. Legal research re global offer	0.80	
10/10/2014	ALG	settlement strategy discussions with MT and SL	0.80	
	KMN		0.10	
10/13/2014		Received phone calls regarding this case. Was able to get an update	0.20	
10/10/2014	1 1// 1	from attorney and forward the information to clients.	0.20	
10/15/2014	SI	Attended office conference with LA re: Rule 68 Research	0.25	
10/10/2011	Si	Performed legal research re rule 68	0.65	
10/16/2014	_	Performed legal research re rule 68 offer of judgment	6.00	
10/10/2011	SI	Drafted letter re: rule 68 offer of judgment	1.65	
	JM	Researched propriety of classwide Rule 68 offer	0.60	
10/17/2014		Performed legal research re Rule 68	2.30	
10/20/2014		Performed legal research re Rule 68, call to D's counsel re Rule 68	0.40	
10/20/2011	_,,,,	rejection and settlement	0.10	
	KMN	COnf w LA re offers of settlement, draft letter to NPs, prepare mailing	0.50	
10/21/2014		conference call with defense attorney re settlement fund	0.30	
10/23/2014		Updated contact information for client.	0.10	
10/27/2014		Answered phone call regarding this case and i was able to update	0.10	
10/21/2014	14/1	client for all information. Updated contact information	0.10	
10/28/2014	INI	scan/file Offer of Judgement	0.10	
11/3/2014		Litigation strategy meeting with/re: LA status of potential settlement,	0.10	
11/3/2014	SL	offer of judgment and how to proceed with discovery issues.	0.20	
11/5/2014	QI.	Client matter re: teleconference with opt-in plaintiff (Cena Martin) re	0.50	
11/3/2014	SL	status of action and intake of claims.	0.50	
	SL		0.20	
	SL	Conference with MT re status of action, potential for settlement and	0.20	
	NA	how to proceed.	0.10	
	INA	Received a call regarding this matter. Forwarded the call to the attorney.	0.10	
11/10/2014	SI	Litigation strategy meeting with LA re how to proceed with offers of	0.20	
11/10/2014	OL	judgment and merits of same.	0.20	
	SL	Thorough review of defendants' lengthy Rule 68 offer; assess how to	1.50	
	OL	proceed in light of same.	1.00	
	SL	Thorough research and analysis re validity of Rule 68 offer for multiple	4.00	
	OL	plaintiffs and class members conditioned upon unanimous	4.00	
		acceptance. Preparation of legal memo re same.		
	SL	Litigation strategy meeting with MT re legal research re Rule 68 offers	0.30	
	OL	to multiple collective and class members, and how to proceed with	0.00	
		potential settlement.		
	SL	Preparation of letter to defense counsel re: invalid Rule 68 offer,	0.70	
	OL	incorporating legal research in support.	0.70	
11/11/2014	SI	Continued preparation of and finalize letter re validity of Rule 68 offer	0.87	
11/11/2014	OL	with legal authority for same.	0.07	
11/13/2014	KMN		0.10	
11/15/2014		Attention to lengthy correspondence from D re settlement position;	0.20	
11/13/2014	OL	assess how to proceed.	0.20	
	SL	Review of various payroll documents and schedules produced for	1.40	
	OL	settlement purposes and in discovery to assess value of potential	1.40	
		settlement.		
11/17/2014	SI	Litigation strategy meeting with MT re audit of defendants' records in	0.20	
. 1, 17,2014	JL	furtherance of settlement position.	0.20	
	SL	Thorough review and analysis of documents produced during	2.60	
	JL	discovery (schedules and payrolls) to assess the average amount of	2.00	
		travel time for undercover guards, and undermine defendants'		
		davor and for undercover guardo, and undermine defendants		

			Hours	Amount
		purported damages calculation.		
11/17/2014	SL	Teleconference with MT re facts to be investigated during tomorrow's audit of SEB records, in furtherance of settlement discussions.	0.20	
	SL	Performed legal research re continuous workday rule and split shift under NYLL in preparation for meeting with Ds counsel and audit in furtherance of settlement.	0.60	
11/18/2014	SL	Review of questionnaire responses and intakes in preparation for today's settlement meeting and audit with defense counsel.	0.80	
	SL	Meeting with Defendants to conduct audit of payroll records in furtherance of class-wide settlement negotiations. Pre and post strategy sessions with MT.	6.50	
11/19/2014	SL	Reassess and calculate class-wide damages in light of issues uncovered in yesterday's audit of the records.	0.90	
	SL	Litigation strategy meeting with LA re outcome of yesterday's audit and how to proceed.	0.20	
	SL	Compare defendants' findings to answers given by opt-in plaintiffs in questionnaire to assess damages value.	0.70	
	SL	Litigation strategy meeting with MT re: meeting with client and reassessed damage calculations in light of audit.	0.20	
11/20/2014	KMN	Conf w SLK re mediation	0.10	
11/25/2014		Received call from client in regards to this case. Gave client up to date information.	0.10	
	SL	Conduct thorough audit of defendants' voluminous boxes of records in furtherance of settlement discussions.	5.50	
11/26/2014	NA	Received two calls from clients who wanted to know information regarding this case. I was able to inform them.	0.20	
12/5/2014	SL	Review of memo re issues uncovered from audit; conference with MT re same.	0.30	
12/23/2014	SL	Litigation strategy meeting with V&A and LB team re how to proceed in action and steps going forward.	0.20	
1/5/2015	NA	Received multiple calls regarding this case.	0.20	
1/6/2015		Client matter re: contact update for Mrs. C. Martin	0.20	
1/12/2015		Updated info for Ms. Cox.	0.10	
1/19/2015		Litigation strategy meeting with MT re upcoming settlement meeting with Ds and steps to be taken.	0.20	
1/20/2015	SL	Conference with LA re upcoming settlement meeting with defendants and Court conference before Judge Go thereafter.	0.20	
1/21/2015	KMN	Client matter re:call re update	0.10	
1/21/2010		Litigation strategy meeting with MT re preparation for tomorrow's conference with the court.	0.20	
1/22/2015	SL	Litigation strategy meeting with LA re today's conference with Judge Go.	0.20	
	SL	Review and analysis of defendant's correspondence and offer of judgment; assess how to proceed.	0.50	
	SL	Litigation strategy meeting with MT re preparation for today's teleconference, suggestions to streamline discovery and how to proceed.	0.20	
	SL	Court Appearance. teleconference with court, inclusive of pre and post strategy sessions with MT.	0.80	
1/26/2015	SL	Conference with LA re recent offer of judgment and how to proceed.	0.20	
. 3. = 2 . •	SL	Calendar meeting re upcoming deadlines.	0.10	

			Hours	Amount
				7 unounc
1/26/2015	SL SL	Performed legal research re unanimous approval of a Rule 68 offer. Performed legal research re issue of Rule 68 offer and relation to attorneys' fees.	1.80 0.70	
	SL	Letter to D issues re validity of offer of judgment, incorporating legal research re same.	0.80	
1/27/2015	SL	Further research and analysis re Rule 68 offer and unanimous acceptance; assess strength of motion to strike in light of case law supporting same.	0.70	
	SL	Continued preparation of and finalize letter in response to Offer of Judgment, incorporating case law highlighting unenforceability of Offer.	1.50	
	SL	Litigation strategy meeting with LA re Rule 68 Offer and potential motion to strike.	0.20	
	SL	Preparation of settlement position statement to court, inclusive of damage calculations and other exhibits.	2.50	
1/28/2015	SL	Teleconference with defense counsel re offers of judgment and potential for settlement.	0.70	
	SL	Litigation strategy meeting with LA re how to proceed in light of teleconference with defense counsel re offers of judgment.	0.20	
	LRA	Attend Telephone conference with conf with Anatasia and Leo re Rule 68 and settlement, post conf with SL	0.50	
1/29/2015	SL	Continued preparation of thorough settlement position statement for Judge Go, in preparation for upcoming settlement conference. Review of documents to submit as exhibits in support of same.	2.00	
	SL	Preparation of updated settlement calculations for settlement conference before Judge Go.	0.80	
	SL	Litigation strategy meeting with LA and JM re split shift/spread of hours rate with respect to travel time claims, and assess value of reasonable settlement.	0.20	
	SL	Review and analysis of defendants' 4th lengthy offer of judgment; assess how to proceed.	0.50	
1/30/2015	SL	Litigation strategy meeting with MT re arguments to be made in settlement statement and flaws in Ds audit.	0.30	
	SL	Review of Defendants' settlement submissions to the court in preparation for upcoming settlement conference. Assess how to proceed.	0.50	
	SL	Continued preparation and finalize thorough Settlement Position Statement, outlining strength of plaintiffs' arguments, chance of SJM, settlement calculations and reasons for same.	3.50	
	KMN	conf w SLK re submitting settlement papers, calls from Ds office re same	0.20	
2/2/2015	SI	delivered papers to E.D.N.Y. court	1.20	
	KMN		0.40	
2/3/2015	SL	Litigation strategy meeting with MT re tomorrow's settlement conference with Judge Go and how to proceed with settlement discussions.	0.20	
2/4/2015	SL	Review of settlement position statements in preparation for today's settlement conference with Judge Go.	0.50	
	SL	Litigation strategy meeting with MT and LA in preparation for upcoming settlement conference with Judge Go.	0.20	
	SL	Settlement teleconference with Judge Go and defense counsel.	2.50	

			Hours	Amount
2/4/2015	SL	Revise damage calculations in light of settlement teleconference with the Court and defense counsel.	0.40	
	SL	Litigation strategy meeting with MT and LA re post- settlement conference, steps to be taken next, and revised calculations.	0.30	
	MN	Sent a fax.	0.10	
	LRA	Office conf with SL re Telephone conference with Judge Go. Reviewed damage calculations and Rule 68 letter. Post conf with SL and MT.	0.70	
2/5/2015	SL SL	Litigation strategy meeting with JB and MT re calculation for damages. Litigation strategy meeting with LA, JB and MT re settlement discussions with defense counsel and how to proceed.	0.20 0.20	
	ALG	Attended office conference with SL re status of SEB settlement and update calcs on guards	0.30	
	KMN		0.10	
2/9/2015	SL	Litigation strategy meeting with JB and MT re how to proceed in light of defendants' improper communications with putative class members and potential bribes.	0.20	
2/10/2015	SL	Attention to correspondence with defense counsel re settlement.	0.20	
2/16/2015	LRA	Client matter re: intake from Friedman with release, check, etc. email to SL, MT. Researched release and Gulf Oil class action communications with class members.	1.20	
	SL	Review of documents received from putative class member re release; assess how to proceed in light of same.	0.50	
2/17/2015	SL	Litigation strategy meeting with LA re how to proceed with order to show cause in light of unlawfully served releases by defendants.	0.20	
	SL	Performed legal research re improper releases obtained and anticipated order to show cause re same.	1.50	
	SL	Begin preparation of order to show cause re unlawful releases signed by putative class members.	1.20	
	LRA	Reviewed class member release, legal research, office conf with SL, client re: class member settlements	2.70	
2/18/2015		REviewed and revised motion, legal research	3.60	
	SL	Preparation of brief in support of order to show cause to cease and desist defendants' improper communications with putative class members.	5.00	
	SL	Research re improper communications with putative class members and courts' broad discretion to oversee.	3.00	
	SL	Teleconference with putative class member (who would like to remain anonymous) re Release received, basis for lawsuit, and how to proceed.	0.50	
	SL	Preparation of accompanying documents in support of order to show cause; revise, finalize, e-file same.	2.50	
	SL	Litigation strategy meeting with LA re arguments to be addressed in OTSC and remedies to be pursued to cure defendants' improper communications.	0.20	
2/19/2015	SL	Preparation of letter to court re courtesy copy.	0.20	
	KMN		1.20	
	SL	Review of defendants' letter in opposition to order to show cause; formulate arguments in response and assess how to proceed.	0.40	

		Hours	Amount
2/19/2015 SL	Litigation strategy meeting with MT and LA re how to proceed with Order to Show Cause in light of defendants' letter in opposition; arguments to be made in response.	0.20	
2/23/2015 SL	Correspondence with defense counsel, review and execute stipulation re substitute attorneys.	0.20	
2/26/2015 SL	Preparation for upcoming OTSC re defendants' improper communications- e.g. review of case law and application to court; formulate arguments in response to defendants' letter.	1.30	
SL	Court Appearance. conference with Court to discuss plaintiffs' OTSC re defendants' improper communications.	0.40	
LRA		0.80	
2/27/2015 SL	Review of defendants' papers in opposition to order to show case; assess how to proceed.	0.40	
3/2/2015 LRA	Reviewed D's reply to P's OTSC	0.80	
3/4/2015 LRA		1.30	
3/6/2015 NA	Received hand delivered documents from SEB; alerted LA	0.10	
3/9/2015 SL	Reviewed files produced for settlement purposes re undercover guards to assess value of settlement proposals made.	2.00	
SL	Correspondence with defense counsel re settlement proposal; review of settlement proposal.	0.20	
3/10/2015 SL	Review and analysis of defendants' personnel files to assess value of defendants' damage calculations per potential claimant.	2.30	
SL	Litigation strategy meeting with LA re preparation for Thursday's settlement conference.	0.20	
SL	Litigation strategy meeting with MT re preparation for Thursday's settlement conference.	0.20	
SL	Review and analysis of Defendants' submission with several exhibits to Judge Go in preparation for Settlement Conference.	0.60	
3/11/2015 SL	Litigation strategy meeting with LA re preparation for tomorrow's settlement conference.	0.20	
SL	Further review of documents produced in furtherance of settlement; calculations and analysis to counter defendants' audit and in preparation for tomorrow's conference.	5.00	
SL	Teleconference with defense counsel, MT and LA re settlement proposal and preparation for tomorrow's conference. Pre and post	1.50	
3/12/2015 SL	conference with LA and MT. Further review of client files produced for settlement purposes, and further propagation for today to confidence before ludge Co	3.00	
SL	further preparation for today's settlement conference before Judge Go. Communications with former manager re SEB's claims and obtained	0.30	
SL	information in preparation for settlement conference. Appear before Judge Go for settlement conference. Inclusive of pre and post strategy meeting with MT.	4.50	
3/16/2015 KMN		0.10	
	·		
3/23/2015 KMN		0.10	
3/27/2015 SL	Attention to correspondence from counsel re settlement offer.	0.10	
3/30/2015 SL	Review of correspondence from defense counsel and revise settlement calculations in light of same. Correspondence to counsel re	0.70	
4/1/2015 SL	same and updated settlement demand. Teleconference with defense counsel re recent settlement value.	0.50	

			Hours	Amount
4/6/2015	MM	Performed legal research re settlement negotiations and attorney's fees for SK in advance of april 8 meeting with judge	4.00	
	SL	Teleconference with client (GAkcelik) re status of action and upcoming settlement conference.	0.30	
	SL	Review and analysis of lengthy correspondence from defendants, regarding their miscalculations in settlement offers; assess how to proceed in light of same.	0.40	
4/7/2015	SL	Preparation of thorough status report letter to client (Akcelik) re procedural history and status of action.	0.30	
	SL	Teleconference with defense counsel re settlement demand and offer.	0.60	
	SL	Litigation strategy meeting with MT re preparation for tomorrow's conference.	0.20	
	MN	Sent a UPS.	0.10	
4/8/2015		Litigation strategy meeting with LA re preparation for today's settlement conference and steps to be taken.	0.20	
	SL	Performed legal research re review and analysis of law regarding negotiation of fees with class settlement- and ethical obligations of same.	0.80	
	SL	Review of recent settlement proposals and correspondence in preparation for today's conference before Judge Go.	0.90	
	SL	Appear before Judge Go for Settlement Conference.	3.00	
4/9/2015		Conference with LA re outcome of yesterday's settlement conference and procedures for settlement.	0.20	
4/15/2015	SL	Preparation of collective and class settlement agreement draft.	2.60	
	SL	Litigation strategy meeting with MT re damage calculations and how to apportion funds for settlement.	0.40	
	SL	Revise settlement calculations to apportion settlement funds depending on class and claims.	0.80	
4/16/2015	SL	Litigation strategy meeting with MT re settlement calculations and terms of settlement agreement.	0.40	
	SL	Teleconference with opt-in plaintiff re settlement amounts.	0.20	
	SL	Communications with named plaintiffs (Gungor and Amadou) re terms and amount of settlement.	0.50	
	SL	Litigation strategy meeting with MT to revise and review damage calculations and apportion settlement amounts.	0.60	
4/20/2015		Review and revise of settlement agreement.	0.60	
4/21/2015		Incorporate revisions and review of settlement agreement; correspondence to defense counsel re same.	0.70	
4/23/2015		Teleconference with defense counsel re revisions to settlement agreement.	0.50	
4/30/2015	SL	Preparation of status report to court re status of settlement. Correspondence with counsel re same.	0.30	
5/5/2015	SL	communication with class member re status of settlement.	0.20	
	SL	Calendar meeting with LA team and LB team re status of action.	0.10	
	SL	Preparation of FLSA Collective and class notices; begin preparation of motion for preliminary approval.	4.40	
5/7/2015	SL	Performed legal research re FLSA settlement factors v. class action settlement factors.	0.60	
	SL	Preparation of motion for final approval of FLSA settlement and preliminary approval of class action settlement.	4.60	

			Hours	Amount
5/7/2015	SL	Litigation strategy meeting with JM and LA re procedure for FLSA settlement re distribution of checks and complaint procedure.	0.20	
5/12/2015	SL	Teleconference with opt-in plaintiff re settlement amount.	0.20	
5/14/2015		teleconference with FLSA member re settlement status and amount.	0.20	
0, 1, 1, 20 10	SL	Status report to court re settlement.	0.20	
5/20/2015	_	Preparation of motion papers for final approval of FLSA Settlement	5.60	
		and preliminary approval of Class Settlement.		
	SL	Continued revisions to settlement agreement and corresponding documents (FLSA and Class Notices, Releases, Declaration etc.)	2.30	
5/21/2015	SL	Teleconference with client (Akcelik) re status of settlement papers.	0.20	
	SL	Teleconference with defense counsel (several times) to review	0.90	
		revisions to settlement papers.		
	SL	Continued preparation of settlement motion papers, FLSA notice,	4.60	
		Class notice and release; incorporate defendants' revisions to same.		
		Correspondence with defense counsel re same.		
5/22/2015	SL	Revise settlement papers; teleconference with defense counsel re	1.80	
		revisions; incorporate same. Finalize and e-file.		
	SL	Preparation of status report to court.	0.20	
5/27/2015		Telephone conference with client re: missing check	0.10	
5/28/2015	SL	Teleconference with defense counsel re terms of settlement	0.20	
	0.	agreement.		
	SL	Meeting with plaintiff Barry to review and execute terms of settlement.	0.50	
	SL	Correspondence with defense counsel re status of executed	0.20	
5/29/2015	CI	settlement papers.	0.60	
3/29/2013	SL	Revise and finalize application to court re approval of executed settlement agreement.	0.60	
	SL	Correspondence with defense counsel re final issues with executed	0.20	
	OL.	settlement agreement.	0.20	
6/1/2015	SI	Finalize and e-file executed settlement agreement.	0.40	
6/9/2015		Printing and organizing courtesy copies.	0.70	
6/10/2015		Letter to court re settlement papers and courtesy copy.	0.20	
0, . 0, _ 0 . 0	IN	sent out documents to Judge Marilyn D. Go	0.10	
6/22/2015		Teleconference to court re upcoming conference; correspondence	0.10	
		with defense counsel re same.		
6/23/2015	SL	Teleconference with defense counsel in preparation for tomorrow's	0.20	
		court conference.		
6/24/2015	SL	Preparation for today's settlement conference with the court- review of	0.40	
		papers submitted in support of preliminary approval of settlement.		
	SL	Revisions to FLSA and class notice in light of issues raised during	0.80	
		teleconference with the court.		
	SL	Court Appearance. teleconference with Court re submission of papers	0.70	
0/07/00/	0.	for preliminary approval of settlement.	2.42	
6/25/2015	SL	Finalize revised FLSA claimant and Class notice; correspondence to	0.40	
0/00/004=	01	defense counsel re same.	0.40	
6/29/2015	SL	Teleconference with defense counsel re revisions to Class and FLSA	0.40	
	CI	notices.	0.70	
	SL	Revise and finalize FLSA and Class notices; letter to court re	0.70	
	MN	submission of same. Scanned and faxed questioner to court.	0.10	
	IVIIN	טטמווויפט מווט ומאפט קטפטווטוופו נט טטנונ.	0.10	

		Hours	Amount
7/1/2015 SL	Teleconference with defense counsel re revisions to FLSA and Class notice, in preparation for tomorrow's teleconference with the court. Correspondence with counsel re same.	0.20	
7/2/2015 SL	Teleconference with court re settlement papers and preliminary approval.	0.50	
7/6/2015 MT	Office conference with SL re FLSA settlement distribution, drafting an email to FRG re same	0.30	
МТ	Reviewing settlement agreement and a list of claimants in connection with the settlement distribution, assessment of tax treatments in connection with back wages and liquidated damages	0.80	
7/7/2015 CI	Calendar re: fairness hearing	0.10	
7/8/2015 SL	Conference with accountant MT re administrator costs and	0.20	
	effectuating the settlement checks.		
7/13/2015 SL	Teleconference with Court to clarify revisions to notices.	0.20	
SL	Revisions to FLSA and Class settlement notices in accordance with	0.60	
	Court's directives. Review of the Court's draft Order granting		
	preliminary and final approval by Court.		
SL	Teleconference with defense counsel re status of settlement papers.	0.10	
7/21/2015 IG	Telephone conference with Gungor Akcelik re settlement payments	0.20	
7/22/2015 IG	Reviewed the file; correspondence with SK re Gungor Akcelik	0.20	
SL	Teleconference with plaintiff re status of settlement.	0.20	
7/23/2015 SL	Conference with MT (accountant) re administration costs and	0.20	
	effectuating settlement checks in two phases.		
SL	Teleconference with MT re amended settlement calculations in light of	0.30	
02	additional claimants recently revealed by Ds.	0.00	
MT	Reviewing settlement agreement terms in preparation for settlement	0.40	
IVI I	distribution, exchanging emails with FRG re distribution costs	0.40	
7/27/2015 SL		0.60	
1/21/2013 SL	Teleconference with the administrator, MT and MT (accountant) re	0.60	
	effectuating terms of the settlement agreement. Pre and post		
	conference with MT effectuating same. Follow up correspondence		
	regarding terms of settlement agreement and memorializing items		
	discussed.		
MT	Teleconference with the administrator (FRG), MT and SL re	0.40	
	effectuating terms of the settlement agreement. Reviewing documents		
	sent to FRG in connection with the distribution		
7/29/2015 MT	Reviewing settlement agreement in connection with the settlement	0.40	
	payments and process to be completed by the class administrator		
8/7/2015 MT	Verification of the master database for purposes of check	1.40	
	disbursements, preparing summary findings of tax treatment for FLSA		
	opt-ins		
8/10/2015 SL	Communications with class administrator and MT re effectuating	0.20	
0/10/2010 GE	settlement checks for FLSA claimants.	0.20	
8/11/2015 MT	Attn to mailing list submitted to class administrator, reviewing and	0.30	
0/11/2010 WIT	comparing with the earlier version for verification purposes	0.00	
8/12/2015 SL	Communications with settlement administrator re effectuating	0.20	
0/12/2013 SL		0.20	
10	settlement checks and notices.	0.00	
IG	Office conference with MT and SKL re settlement payments and Mr.	0.20	
	Akcelik	0.00	
MT	Attn to settlement notice and exchanged emails in connection with tax	0.20	
	deductions and withholdings from the settlement checks		

		Hours	Amount
8/13/2015 SL	Teleconference with claims administrator re status of settlement checks.	0.20	
SL	Teleconference with Named P (GA) re status of settlement checks.	0.20	
8/14/2015 IN	telephone conference with Solomane Kamara regarding address	0.10	
0, 1 1, 20 10 111	update.	0	
8/17/2015 SL	Teleconference with client (GA) re status of settlement check.	0.20	
SL	Communication with claims administrator re status of settlement checks.	0.20	
8/18/2015 SL	Teleconference with FLSA claimant re settlement amount.	0.20	
GS	Explained settlement details to client. Reviewed settlement material at	0.40	
	client's behest. Called client back to provide update. Referred to LA.		
8/24/2015 SL	Teleconference with several class members (several times) to	0.70	
	respond to inquiries re settlement terms and notice.		
8/25/2015 SL	Teleconference with several class members (numerous times) to	0.50	
	respond to inquiries re settlement notice.		
8/26/2015 SL	Teleconference with named plaintiff (GA) re status of settlement	0.20	
	checks and service award.		
8/27/2015 SL	Teleconference (several times) with several potential claimants	0.40	
	responding to inquiries re settlement.		
8/28/2015 IN	Telephone conference with Khalif Vandross regarding status and	0.10	
	address update		
9/8/2015 SL	Teleconference with FLSA claimant (FD) re terms of settlement.	0.20	
9/9/2015 SL	Teleconference with FLSA claimant to respond to inquiry re settlement.	0.20	
CI	Client matter re: update client Edith Mcgee on case	0.10	
9/10/2015 GS	Updated client on case	0.10	
9/15/2015 SL	Teleconference with plaintiff (GA) re status of settlement and service award.	0.20	
SL	Several teleconferences with numerous FLSA and class claimants to	0.50	
0/47/2045 CI	respond to inquiries re terms of settlement and to clarify notices.	0.20	
9/17/2015 SL	Teleconference with FLSA Claimant (EM) re status of settlement	0.20	
9/21/2015 SL	checks; correspondence with administrator to follow up on same. Teleconference with FLSA claimant (F. D.) to respond to inquiries re	0.20	
9/21/2013 SL	settlement terms and how to proceed; follow up correspondence re	0.20	
	same.		
9/29/2015 SL	Thorough review of Judge Chen's decision denying D's motion to	0.50	
0/20/2010 OL	decertify, granting P's motion to amend and denying both motions for	0.00	
	summary judgment; assess how to proceed in light of same.		
9/30/2015 SL	Meeting with client (Barry) re status of settlement.	0.20	
10/7/2015 SL	Teleconference with administrator and bank representative re	0.20	
. 0, . , _ 0 . 0 . 0 _	claimant's settlement checks.	0.20	
SL	Communications with administrator re status of settlement claimants	0.20	
	and amounts paid.		
10/8/2015 SL	Begin preparation of motion for final settlement approval and fee application.	1.80	
SL	Teleconference with Named P (GA) re status of settlement and fairness hearing.	0.10	
Fo	or professional services rendered	775.66	\$254,211.02

Additional Charges:

	Amount
10/18/2011 \$Court Fee	350.00
Court fee 10/20/2011 \$Transportation	2.25
Transportation from EDNY 1/23/2012 Service of Process Fee	67.50
Colby	
\$PACER fee 2/13/2012 Service of Process Fee	0.16 78.00
Gotham 4/24/2012 \$PACER fee	0.24
\$PACER fee \$Dinner	5.52 37.39
Dinner	
5/7/2012 \$Westlaw/Lexis LexisNexis	4.92
5/17/2012 Duplicating Fee 6/7/2012 \$Westlaw/Lexis	39.13 0.03
Westlaw/ LexisNexis 7/6/2012 \$Westlaw/Lexis	4.23
Lexis	
7/11/2012 \$Transcript fee Transcript fee	490.55
\$Transcript fee Transcript fee	588.10
7/12/2012 \$PACER fee \$PACER fee	23.80 2.60
7/16/2012 \$Transcript fee	490.55
Transcript fee: TSG Reporting \$Transcript fee	588.10
TSG Reporting 7/30/2012 UPS	20.16
UPS UPS	20.16
UPS	
UPS UPS	7.56
UPS UPS	10.08
Duplicating Fee 8/8/2012 \$Westlaw/Lexis	43.57 9.11
Westlaw	
9/6/2012 \$Legal Research LexisNexis	1.48
9/21/2012 \$Transcript fee Transcript fee- LH Reporting Invoice 11228	1,409.75
10/4/2012 \$Westlaw/Lexis Lexis	3.66
10/15/2012 \$PACER fee	62.80

		Page	45
		Aı	mount
10/19/2012 11/19/2012	Deposition Costs		49.75 94.50
5/21/2013	Deposition Costs for SL Copying cost Copying cost	4	44.10
5/23/2013	\$Westlaw/Lexis Lexis	•	13.95
1/31/2014 3/13/2014	\$PACER fee	3,09	9.10 95.19
4/8/2014	\$Translation Translation	1	10.00
4/22/2014	\$PACER fee PACER fee		3.90
6/25/2014	Copying cost	į	56.40
6/30/2014	Copying etc. cost payable to: ACRO Photo Print Inc., Inv. #161612 \$Westlaw/Lexis Westlaw		1.61
12/16/2014	\$PACER fee \$Westlaw/Lexis Duplicating Fee		4.80 30.18 42.59
2/13/2015	print, tab, bind settlement papers - Acro invoice 163296 \$Legal Research LexisNexis search - Invoice date 2015-01-31 - Invoice Number; 1501419151- \$36.70 + tax	(39.97
3/16/2015	(3.27) \$Legal Research		4.90
4/17/2015	Lexis Nexis - Invoice #1502418672 - 2/28/15 \$PACER fee		6.70
4/20/2015	Pacer Fee - Invoice #2657597-Q12015 - Date: 01/01/15 - 03/31/15 UPS UPS - Sent to Mr. Gungor Akcelick - 40+ Wyandanch Avenue Apt 32	2	25.66
5/20/2015	West Babylon, NY 11704 \$Mediation	24	43.75
6/9/2015	Mediation - Patrick Michael McKenna ref; 010227 \$Legal Research		4.43
	Lexis Nexis - Invoice #1504372074 \$Legal Research		0.57
	Lexis Nexis - Invoice #1505371467 \$PACER fee		13.50
8/20/2015	Pacer Fee - 2nd Qtr Invoice UPS		22.00
	UPS - Sending FRG settlement check	——————————————————————————————————————	70.05
	Total costs	\$ 9 ,0	78.95
	Total amount of this bill	\$263,28	89.97

Attorney Summary

Name	Hours	Rate
Lloyd Ambinder	52.30	525.00
Marta Nadgorska	4.10	125.00
Christina Isnardi	0.30	125.00
Christina Isnardi	4.10	0.00
Eric Chan	3.40	90.00
Eric Jagielski	1.50	125.00
Ines Cruz	9.08	125.00
Isabel Gardocki	136.10	250.00
Iwona Ner	28.30	125.00
Izabela Gardocka	6.00	125.00
James Murphy	12.30	425.00
Kara Miller	0.50	395.00
LaDonna Lusher	14.00	425.00
Leonor Coyle	1.10	395.00
Maria Tokarz	4.40	350.00
Maria Tokarz	0.30	225.00
Maria Tokarz	0.20	90.00
Michelle Moreno	4.00	125.00
Nancy Abreu-Duverge	1.20	125.00
Rebecca Molofsky	22.40	90.00
Sara Isaacson	9.75	125.00
Suzanne Leeds	411.73	395.00
Venus Velez	5.30	125.00
Venus Velez	1.10	95.00
Griffin Simpson	0.50	125.00
Konstancja Maleszynska	25.50	125.00
Yeskenia Polanco	5.20	125.00
Amanda Saw	4.80	90.00
Alison Genova	6.20	195.00